

**SUPPORTING STATEMENT – PART A for
OMB Control Number: 0584-NEW**

**Review of Child Nutrition Data & Analysis for Program
Management**

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A.1. CIRCUMSTANCES THAT MAKE DATA COLLECTION NECESSARY

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 Richard B. Russell National School Lunch Act of 1946 (42 U.S.C. 1751 et seq.) and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) provide the legislative authority for the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to administer the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Section 305 of the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296) requires state and local entities operating the Child Nutrition Programs to participate in USDA-initiated studies and evaluations. These statutes are included in Attachment A.

These programs provide Federal financial assistance and USDA Foods to public and non-profit private schools and residential childcare institutions to facilitate serving meals that meet nutritional standards. At the Federal level, FNS oversees the programs and provides guidelines to support program administration. In most States, State Education Agencies, henceforth State Child Nutrition (CN) Agencies, administer NSLP/SBP; State Departments of Agriculture administer the program in three States. At the local level, School Food Authorities (SFAs) operate the programs through agreements with States.

In accordance with Federal regulations, SFAs collect a range of *required and reported* basic data elements that States and FNS use to monitor program reach, efficiency, and implementation. These reported data elements include data on direct certification matching, student free and reduced price certification, verification, reimbursable meal counts and meal prices, among

others. SFAs also collect additional, *non-reported* data needed to manage their operations, and monitor and maintain financial standing. These non-reported data include meal production, labor cost, food cost, and inventory data, as well as additional details on many data elements that SFAs report in aggregate to FNS or States.

While SFAs collect a wide array of data to enhance local administration, States request and aggregate only a small subset of this data for reporting to FNS, often aggregated at the State level. SFAs report only a fraction of the data they collect, as current State and Federal data collection requirements for the NSLP/SBP historically sought to minimize paperwork and reporting burden for SFAs that primarily used manual paper-based reporting processes or early computer systems to manage their data. However, as the processes for managing the programs have become more complex, SFAs and States have migrated from paper-based processes to Management Information Systems (MIS) of varying levels of sophistication for management of both reported and non-reported data collection activities.

The purpose of the *Review of Child Nutrition Data and Analysis for Program Management* study is to document the current status of SFAs' and State NSLP/SBP MIS, including system implementation, history, costs, longevity, functions, data elements, support, security, interoperability, and challenges. As the primary administrator of the NSLP and the SBP, and as supported by Section 305 of the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296) requiring State and local entities operating the Child Nutrition Programs to participate in USDA-initiated studies and evaluations, FNS has the responsibility and authority to conduct such studies related to program operations, management, and improvement.

FNS intends to use the results of this study to evaluate the available data elements State agencies and SFAs collect for their operation of the NSLP and SBP, but that are not reported to FNS. FNS will use these results to identify specific data elements that may be required to be reported to FNS in the future, to improve program oversight. In addition, FNS will use the information gathered from the study to provide technical assistance to State agencies and SFAs, and to develop MIS best practices.

A.2. PURPOSE AND USE OF THE INFORMATION

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.

USDA's FNS is requesting Office of Management and Budget (OMB) approval to conduct a new information collection that includes two surveys:

1. A survey of all State CN agencies responsible for administering NSLP/SBP; and
2. A survey of a nationally representative sample of small, medium and large SFAs.

The multi-modal surveys (administered via mail, telephone, and Web) will be administered during the 2016–2017 school year. (Study recruitment materials and surveys are included in **Attachments B.1- B.12**). Based on findings from formative research tasks of the project, including brief discussions with State agency and SFA officials, FNS expects respondents to include State and SFA directors. Data collected from these surveys will provide FNS with a baseline “as-is” assessment of current MIS used by State CN agencies and SFAs, as well as a detailed accounting of data elements and how data systems are used beyond fulfilling FNS reporting requirements. The two surveys will seek information on types and uses of data collected as part of child nutrition functions such as point of sale/service, nutrient analysis and

menu planning, inventory management and ordering, purchasing and vendor management, USDA food tracking, and financial management.

From whom the information will be collected. FNS will administer the voluntary survey to representatives of State CN agencies in all 50 States and the District of Columbia. There will be no sampling for the State survey; it will be a census. The voluntary SFA survey will be administered to a nationally representative sample of SFAs. The SFA sample will be representative in terms of FNS region and size of SFA, as measured by the number of enrolled students in the 2014-2015 school year. The State CN Directors and SFA Directors will be the main respondent for their respective surveys.

Frequency of collection. FNS will conduct each data collection once only, with each survey requiring approximately 60 minutes to complete. FNS will field both surveys in School Year 2016-2017.

Purpose of the collection. Combined, these two data collection activities will fulfill eight research objectives of the study:

1. **Objective 1:** Determine the baseline “as is” functionality of State and SFA NSLP/SBP data management information systems.
2. **Objective 2:** Assess when State and local NSLP/SBP data management information systems were developed, and the expected longevity of these systems.
3. **Objective 3:** Determine the typical costs of developing, maintaining, modifying and replacing State and local NSLP/SBP data management information systems.

4. **Objective 4:** Outline the data elements that State and SFA NSLP/SBP data management systems collect and generate, beyond those reported to FNS, to administer and manage the NSLP and SBP at the State and SFA levels. Describe how the data elements are defined.
5. **Objective 5:** Describe how long these data elements are retained and how frequently they are updated.
6. **Objective 6:** Determine how commonly these data elements are collected or generated. In addition, assess what proportion of States and SFAs collect or generate NSLP/SBP management data that they do not report to FNS.
7. **Objective 7:** Determine the functions that these data elements serve. Describe the types of access, analysis, and standard or ad-hoc report generation supported by State and local NSLP/SBP data systems.
8. **Objective 8:** Describe the technical and other challenges SFA and State administrators face in NSLP/SBP data collection, aggregation, and reporting. Describe the perceptions of these officials of the quality of the reported data.

Information shared with any other organizations inside or outside USDA or the government. By fulfilling these objectives, the study will provide nationally representative findings to support FNS's responsibilities to monitor program operations, management, and improvement. FNS has contracted with IMPAQ, International, LLC (IMPAQ), to conduct the two surveys and analyze the results to address the research objectives. The analysis will identify any variation in SFA findings by representative samples of small, medium and large SFAs, and

those operating under Provision 2/3 and the Community Eligibility Provision (CEP).¹ A final report will provide summary and detailed findings. In addition, a final version of the data will be produced in restricted-use and public-use formats. FNS will use this information to determine future FNS data reporting requirements as well as a basis to provide technical support to States and SFAs. Currently, FNS is the only Federal agency that will use the data from the State and SFA surveys.

How the information will be collected. Building on established relationships during the preliminary data examination stage of the study, FNS will again contact each FNS Regional Office (FNSRO) study point of contact (POC) by sending them an information package. This package will contain:

- A letter informing them of the data collection phase of the study;
- An overview of the study, which describes the study objectives, the State Census and the SFA Web Survey, and a timeline for the data collection;
- The brochure that will be sent to the State CN Directors and SFA Directors (**Attachments B.1.3 and B.2.3**);
- A letter that the POC can send to each of the states in his/her region informing them of the study, encouraging them to participate in the State Census, and asking them to help gain the cooperation of SFAs (**Attachment B.1 and B.2**), and
- A list of Frequently Asked Questions (FAQs) (**Attachment B.1.2 and B.2.2**).

¹ CEP, authorized by the HHFKA, allows local educational agencies and schools in high-poverty areas to offer free breakfast and lunch to all enrolled students without the burden of collecting free and reduced price applications. Federal reimbursement is provided through a formula based on the percentage of enrolled students identified as participating in other federal assistance programs.

After states have been notified by the FNSRO study POC, State CN agencies will be sent by mail and email an advance notice (**Attachment B.1**) with a study overview and brochure (**Attachments B.1.1 and B.1.3**) and a list of Frequently Asked Questions (FAQs) - **Attachment B.1.2**. SFA directors will similarly receive an advance notice (**Attachment B.2**) with a study overview and brochure (**Attachments B.2.1 and B.2.3**) and a list of FAQs (**Attachment B.2.2**). This will be followed by an email with a link to the Web survey itself (**Attachment B.4**) to State directors and (**Attachment B.3**) to SFA directors.

Trained data collectors will use emails (**Attachments B.5 and B.6**), followed by telephone calls (**Attachments B.7 and B.8**), to remind non-respondents to complete the surveys. In particular, one week after sending out survey links, non-responding SFAs and State CN agencies will receive reminder emails. Two more reminder emails will be sent at two-week intervals (using **Attachment B.5** for SFAs and **Attachment B.6** for State CN agencies). After the three rounds of emails, non-respondents will receive three rounds of phone calls at two-week intervals (using the script in **Attachment B.7** for SFAs and **Attachment B.8** for State CN agencies.)

A.3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION

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 seeks to comply with the E-Government Act of 2002, which promotes the use of technology to reduce respondent burden. FNS will primarily administer the State and SFA surveys via the Internet. With the exception of pre-survey notification (see **Attachments B.1 and B.2**), all communication with respondents will consist of emails and phone calls. The initial survey

invitation will be via email (**Attachment B.3** for SFA Directors and **Attachment B.4** for State Agency Directors) as well as subsequent follow-ups with non-respondents (**Attachment B.5** for SFA Directors and **Attachment B.6** for State Agency Directors). After the three rounds of follow-up emails, we will call remaining non-respondents (see **Attachment B.7** for SFA Directors and **Attachment B.8** for State Agency Directors). FNS expects 99 percent of survey responses (or 2,046) comprising 50 out of the anticipated 51 State CN survey responses and 1,996 out of anticipated 2,016 SFA survey responses will be collected electronically. Of the overall responses for the collection, FNS estimates that 14% will be collected electronically. A few respondents may opt to respond using the paper version mailed as part of the pre-notification.

A.4. EFFORTS TO IDENTIFY DUPLICATION AND USE OF SIMILAR INFORMATION

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.

This study addresses a new set of specific questions related to the capabilities, uses, and information that States and SFAs collect as part of their routine administration of two multi-component FNS nutrition assistance programs – the NSLP and SBP. FNS has concluded that there are currently no data collections that contain similar information relevant to the objectives of this study. FNS reached this conclusion after 1) consultation between FNS and IMPAQ; and 2) a search of published literature, gray literature, and USDA reporting requirements for recent research or information on school nutrition MIS (see **Attachment C** for list of citations).

Currently, the School Nutrition Association (SNA) annually surveys its member SFAs to analyze and update them on trends within school food service and nutrition. The survey typically includes questions on finances, administration, technology, and meals. SNA publishes the survey results in the annual School Nutrition Operations Report.² This annual series of reports is lacking in several respects for this study:

1. It includes only SFAs and not State child nutrition agencies;
2. It is not nationally representative; and
3. The breadth of questions on technology is limited to operational technologies with no information on data elements.

FNS studies include the *School Nutrition Program Operations Study*, which surveys both States and SFAs about their policies and practices. Survey questions focus primarily on operational, financial, and general administration aspects of the NSLP/SBP, and do not provide detail on the MIS used in the administration of these programs.³ The *National School Lunch Program Direct Certification Improvement Study* collects information on frequency of data collection, interoperability protocols supporting direct certification, and challenges and barriers related to direct certification. The findings, however, are limited to only one of many functions managed by MIS and the study only collected data from States.⁴

Within peer-reviewed literature, few studies have collected data that are similar to this collection.

Pratt et al. (2012) surveyed school nutrition directors in the Southwest Region to understand

² The State of School Nutrition 2014. Available online at: <https://my.schoolnutrition.org/productcatalog/product.aspx?ID=8946>

³ May, L., Standing, K., Chu, A., Gasper, J., and Riley, J. (2014). *Special Nutrition Program Operations Study: State and School Food Authority Policies and Practices for School Meals Programs School Year 2011-12*. Available online at:

<http://www.fns.usda.gov/special-nutrition-program-operations-study-state-and-school-food-authority-policies-and-practices>

⁴ Moore, Q., Gothro, A., Conway, K., Kyler B. (2014). *National School Lunch Program Direct Certification Improvement Study. Prepared by Mathematica Policy Research, Under Contract No. AG-3198-D-10-0074. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Joseph F. Robare*. Available online at: www.fns.usda.gov/research-and-analysis.

perceptions on school nutrition software/technology.⁵ However since this study was not nationally representative and of limited scope, its findings cannot substitute for this proposed data collection.

A.5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES

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

FNS has determined that the requirements for this information collection do not adversely affect small businesses or other small entities, and only a minimum amount of information will be collected to meet the study's objectives. There are no small businesses responding to this data collection. All new data collection is with State Child Nutrition agencies and SFAs. Further, while some SFAs are smaller, they have the same reporting requirements as larger SFAs, and should be as likely as the larger SFAs to be able to answer the survey questions. Approximately 2,176 or 86 percent of the initial sample of 2,520 SFAs will be considered small (i.e., serving <1000 students) (See B.1 in Part B). All State Child Nutrition agencies are considered large. Among the total of 4,382 respondents, 87 percent (3,824) will be from small entities (all SFAs).

A.6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY

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 information collection proposed for this study is designed to satisfy the needs of FNS. A one-time survey will produce the needed data to fulfill the eight research objectives described in A.2. If these data are not collected, FNS will not have critical information for assessing the

⁵ Pratt, P., Bednar, C., Kwon, J. (2012). "School Nutrition Directors' Perceptions of Technology Use in School Nutrition Programs." *The Journal of Child Nutrition and Management*. 36(2), A65.

current state of State and SFA MIS, which can help inform future Federal reporting requirements and the need to provide technology support at the State and local levels for improved program operations.

A.7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINE OF 5 CFR 1320.5

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- 1. Requiring respondents to report information to the agency more often than quarterly;**
- 2. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- 3. Requiring respondents to submit more than an original and two copies of any document;**
- 4. Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than 3 years;**
- 5. 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;**
- 6. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- 7. 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;**

- 8. 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.**

Since States and SFAs may use proprietary software to operate NSLP and SBP, it is possible that current contracts forbid disclosure of some system functionalities to FNS. FNS will assure respondents of the privacy of such information in accordance with the Privacy Act of 1974 and the System of Records Notice for Studies and Reports (FNS-8⁶). In addition, the data collection contractor for FNS will protect the privacy of proprietary information provided by respondents. Thus, all data collection staff who will work with the data will sign a confidentiality pledge (**Attachment E**). No disaggregated results will be presented that may lead to the identification of proprietary information. There are no other special circumstances. This one-time collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A.8. COMMENTS IN RESPONSE TO THE FEDERAL REGISTER NOTICE AND EFFORTS TO CONSULT OUTSIDE AGENCY

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.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

- 1. Federal Register Notice and Comments**

⁶ FNS-8 USDA/FNS Studies and Reports 56 FR 19078-19080.

A notice was published in the *Federal Register* on January 20, 2016, Volume 81, pages 3097-3099. **One comment** was submitted during the public comment period (Attachment F).⁷ The comment simply indicated that this was a new information collection; it did not substantively address the proposed information collection for this study.

2. Consultations Outside of the Agency

The FNS Child Nutrition State Systems Workgroup (CNSSW) provided input in the design of this study. The CNSSW, established by FNS in 2011, consists of 10 Child Nutrition State agency representatives. The group focuses on identifying and providing direction to FNS on State technology issues and technical assistance needs. As subject matter experts, members of the CNSSW reviewed draft surveys and provided input on survey question content and prioritization. **Attachment D.1** shows the members of the CNSSW.

The survey development process included cognitive interviews on the draft State survey with representatives from three State Child Nutrition agencies, and six cognitive interviews with representatives from SFA school nutrition departments on the draft SFA survey. For each survey, the survey team elicited feedback from a mix of program and IT managers and staff on their understanding of the questions and response items, and the source and quality of the responses provided. The findings from the cognitive interview pre-tests helped refine and finalize the two data collection instruments included in this clearance request. A cognitive interview memorandum (**Attachment D.2**) summarizes the results.

Three additional formative research activities provided a foundation for the development of the survey: 1) a Request for Information collecting information from NSLP/SBP MIS vendors; 2)

⁷ See <https://www.federalregister.gov/articles/2016/01/20/2016-01005/agency-information-collection-activities-proposed-collection-comment-requested-review-of-child>.

presentations by select NSLP/SBP MIS vendors; and 3) unstructured discussions and MIS system document reviews with States and SFAs.

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. **Attachment G** presents the comments provided by the NASS representative.

A.9. EXPLANATION OF ANY PAYMENT OR GIFT TO RESPONDENTS

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

State and SFA respondents will not receive payments or gifts for their participation in the surveys.

A.10. ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports, published in the *Federal Register* on April 25, 1991, (56 FR 19078-19080), discusses the terms of protections that will be provided to respondents. Furthermore, all hard copy survey responses will be in a locked file cabinet and electronic survey response data in encrypted files, to ensure the link between any response and an individual will only be accessible to study researchers. In addition, researchers will destroy hard copy and electronic files at the conclusion of the study pursuant to applicable USDA regulations.

The data collection contractor will store electronic survey responses in its secure data environment, which is compliant with the following standards:

1. Federal Information Security Management Act of 2002 (FISMA)
2. National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53
3. Federal Information Processing Standards (FIPS) 199,
4. Standards for Security Categorization of Federal Information and Information Systems,
5. Health Insurance Portability and Accountability Act of 1996

All storage and processing of sensitive project data occurs on a FISMA-compliant enclave, protected by a state-of-the-art router, firewall and intrusion detection and prevention system that is monitored and requires dual-authentication using RSA tokens for access. All data stored are encrypted with encryption mechanisms that comply with FIPS 140-2 requirements.

All interviewers employed by the contractor are required to sign a data confidentiality pledge (**Attachment E**) associated specifically with this study. In this agreement, staff members pledge to maintain the privacy of all information collected from respondents and to not disclose it to anyone other than authorized representatives of the study, except as otherwise required by law. As another layer of protection, Web links sent to the survey respondents will be password-protected. This will ensure that only respondents can view the information they provide during the data collection period.

A.11. JUSTIFICATION FOR SENSITIVE QUESTIONS

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.

There are no questions of a sensitive nature included in this study.

A.12. ESTIMATES OF HOUR BURDEN INCLUDING ANNUALIZED HOURLY COSTS

Provide estimates of the hour burden of the collection of information. The Statement should:

- 1. 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.**

This is a new data collection with an estimated burden of 4,382 respondents, 14,912 responses, and 2,712 burden hours, as shown in **Table A.1** and **Attachment H: Sample Sizes, Estimated Burden, and Estimated Cost of Respondent Burden**. The information collection plan includes Web surveys distributed to all 51 State agencies, and a sample of 2,520 SFAs. These estimates reflect feedback from the cognitive pretesting of surveys and FNS experience in conducting similar surveys in the past. All States and sampled SFA POCs will receive survey advance notifications. Action on the notification is estimated to require an average of five (5) minutes (0.08 hours) of both State and SFA directors, who will be the main points of contact for the survey. All respondents will spend another five minutes on the survey invitation email.

The estimate assumes 100 percent completion rate by State CN agencies. Fifteen of the 51 State agencies (including the District of Columbia) will respond to the initial Web survey invitation (representing a 29 percent response rate). The remaining 36 states will provide complete responses after three follow-up email reminders and three telephone calls. Each round of email reminders will yield four additional responses, for a total of 12. After the third round of email reminders, there will be three rounds of phone calls to non-respondents. Each round of phone calls will lead to eight additional responses each for a total of 24 responses. Follow-up email reminders and phone calls will cause a 1.5 minutes (or 0.03 hours) burden on respondents and non-respondents.

FNS estimates that the SFA survey completion burden assuming an 80 percent response rate (approximately 2,016 complete responses) and one respondent per SFA, with a survey response time of approximately 60 minutes or 1 hour and a non-response time of 3 minutes (0.05 hours). We estimate that SFA Directors will spend 5 minutes (0.08 hours) to review the subsequent email invitation to the Web survey. An estimated 11 percent of the 2,520 sampled SFAs will complete the Web survey after the invitation email ($2,520 \times 0.11 = 277$ responses). Non-respondents will receive three email reminders, with a burden of 1.5 minutes (0.03 hours) from each contact. It is estimated that each round of email reminders will lead to additional 202 responses, for a total of 606 responses. Three rounds of phone calls will follow the email reminders to non-respondents. Each round of phone calls will lead to 378 responses, for a total of 1,134 responses. Combining the State responses and SFA findings results in a total of 14,912 (9,012 for responses, and 5,900 for non-responses) respondents and 2,712 hours (2,552 for responses and 160 for non-responses).

Table A.1 shows the estimated reporting burden of the information collection on State child nutrition agencies and SFAs. The reporting burden for the follow-ups consists of the time taken by representatives of State agencies to respond to emails or telephone calls.

Table A.1: Total Burden Hours on the Public

Respondent Category	Type of Respondent	Data Collection Activity/Instrument	Attachment ID	Sample Size	Responsive					Non-Responsive					Total Hours (Respondents and Non-respondents)	
					Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per	Total Burden Estimate (Hours)	Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Total Burden Estimate (Hours)		
State/ Local/ Tribal Government	State Agencies															
	Cognitive Pre-Testing of Survey															
	State Agency Directors	Recruitment Email		4	3	1	3	0.08	0.24	1	1	1	0.08	0.08	0.32	
	State Agency Directors	Recruitment Phone Call		3	3	1	3	0.08	0.24	0	0	0	0	0.00	0.24	
	State Agency Directors	Interviews		3	3	1	3	3.00	9.00	0	0	0	0	0.00	9.00	
	Sub-total for Cognitive Pre-Testing				4	3	3	9	1.05	9.48	1	1	1	0.08	0.08	9.56
	Survey of State Agencies															
	State Agency Directors	Advance Notice to State Directors	B.1, B.1.1, B.1.2, B.1.3	51	51	1	51	0.08	4.25	0	0	0	0	0.00	4.25	
	State Agency Directors	State Survey Email Invitation	B.4	51	51	1	51	0.08	4.25	0	0	0	0	0.00	4.25	
	State Agency Directors	Census Follow-up Email 1*	B.6	36	4	1	4	0.03	0.10	32	1	32	0.03	0.80	0.90	
	State Agency Directors	Census Follow-up Email 2*	B.6	32	4	1	4	0.03	0.10	28	1	28	0.03	0.70	0.80	
	State Agency Directors	Census Follow-up Email 3*	B.6	28	4	1	4	0.03	0.10	24	1	24	0.03	0.60	0.70	
State Agency Directors	Census Follow-up Phone Call 1*	B.8	24	8	1	8	0.03	0.20	16	1	16	0.03	0.40	0.60		
State Agency Directors	Census Follow-up Phone Call 2*	B.8	16	8	1	8	0.03	0.20	8	1	8	0.03	0.20	0.40		

Respondent Category	Type of Respondent	Data Collection Activity/Instrument	Attachment ID	Sample Size	Responsive					Non-Responsive					Total Hours(Respondents and Non-respondents)
					Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per	Total Burden Estimate (Hours)	Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Total Burden Estimate (Hours)	
State Agency Directors	Census Follow-up Phone Call 3*	B.8	8	8	1	8	0.03	0.20	0	0	0	0	0.00	0.20	
State Agency Directors	State Agency Survey	B.11	51	51	1	51	1.00	51.00	0	0	0	0.00	0.00	51.00	
Sub-total for Survey of State Agencies			51	51	4	189	0.32	60.40	36^y	3	108	0.03	2.70	63.10	
Sub-total for State Agencies			55	54	4	198	0.35	69.88	37	3	109	0.3	2.78	72.66	
School Food Authorities															
Cognitive Pre-Testing															
SFA Directors	Recruitment Email		7	6	1	6	0.08	0.48	1	1	1	0.08	0.08	0.56	
SFA Directors	Recruitment Phone Call		6	6	1	6	0.08	0.48	0	0	0	0	0.00	0.48	
SFA Directors	Interviews		6	6	1	6	3.00	18.00	0	0	0	0	0.00	18.00	
Sub-total for Cognitive Pre-Testing			7	6	3	18	1.05	18.96	1	1	1	0.08	0.08	19.04	
Survey of School Food Authorities															
SFA Directors	Advance Notice to SFA Directors	B.2, B.2.1, B.2.2, B.2.3	2,520	2,520	1	2,520	0.08	201.60	0	0	0	0	0	201.60	
SFA Directors	SFA Survey Email Invitation	B.3	2,520	2,520	1	2,520	0.08	201.60	0	0	0	0	0	201.60	
SFA Directors	Survey Follow-up Email 1^	B.5	1,764	202	1	202	0.03	5.05	1,562	1	1,562	0.03	39.05	44.10	
SFA Directors	Survey Follow-up Email 2^	B.5	1,562	202	1	202	0.03	5.05	1,360	1	1,360	0.03	34.00	39.05	
SFA Directors	Survey Follow-up Email 3^	B.5	1,360	202	1	202	0.03	5.05	1,158	1	1,158	0.03	28.95	34.00	
SFA Directors	Survey Follow-up Phone Call 1^	B.7	1,158	378	1	378	0.03	9.45	780	1	780	0.03	19.50	28.95	
SFA Directors	Survey Follow-up Phone Call 2^	B.7	780	378	1	378	0.03	9.45	402	1	402	0.03	10.05	19.50	
SFA Directors	Survey Follow-up Phone Call 3^	B.7	402	378	1	378	0.03	9.45	24	1	24	0.03	0.60	10.05	

Respondent Category	Type of Respondent	Data Collection Activity/Instrument	Attachment ID	Sample Size	Responsive					Non-Responsive					Total Hours(Respondents and Non-respondents)
					Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per	Total Burden Estimate (Hours)	Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Total Burden Estimate (Hours)	
	SFA Directors	SFA Survey	B.12	2,520	2,016	1	2,016	1.00	2,016.00	504	1	504	0.05	25.20	2041.20
	Sub-total for Survey of School Food Authorities			2,520	2,520	3.49	8,796	0.28	2,462.70	1,764[^]	3.28	5,790	0.03	157.35	2,620.05
	Sub-total for School Food Authorities			2,527	2,526	3.49	8,814	0.28	2,481.66	1,765	3.28	5,791	0.03	157.43	2,639.09
	Grand Total Reporting Burden			2,582	2,580	3.49	9,012	0.28	2,551.54	1,802	3.27	5,900	0.03	160.21	2,711.75
* Assumes 29% of States will respond to the invitation email, leading to 15 responses. Each subsequent follow-up email will yield an 8% response rate (or 4 responses) and phone call will yield a 15% response rate (or 8 responses) until all 51 State CN agencies respond.															
^ Assumes 11% of sampled SFAs will respond to the invitation email and complete the survey. Each email reminder will result in 8% response. Each subsequent phone call will yield 15% response rate.															
[^] 36 represents the State Nutrition Agencies that do not respond to the first email invitation and therefore are part of the sample that receives the first follow-up e-mail. This represents the maximum number of unique non-respondents. Similarly, 1,764 represents the unique number of SFA non-respondents to the survey invitation email.															

2. 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 the respondents (including those considered responsive and nonresponsive) for the hours of burden for this data collection. The wages in Table A.2 are the mean hourly wages reported by the Department of Labor’s Bureau of Labor Statistics for NAICS code 999200 in May 2015: State government, excluding schools and hospitals. The estimates use the average wages for chief executives (\$54.26) for State Education Agency (or equivalent agency) directors and food service managers (\$26.95) for SFA directors.

Table A.2: Annualized Cost to Respondents

Type of Respondent	Data Collection Activity/Instrument	Attachment ID	Hourly Wage	Total Annualized Cost Burden
State Agencies				
Cognitive Pre-Testing				
State Agency Directors	Recruitment Email		\$54.26	\$17.36
State Agency Directors	Recruitment Phone Call		\$54.26	\$13.02
State Agency Directors	Interviews		\$54.26	\$488.34
Sub-total for Cognitive Pre-Testing			\$54.26	\$518.73
Survey				
State Agency Directors	Advance Notice to State Directors	B.1, B.1.1, B.1.2, B.1.3, B.3, B.10	\$54.26	\$230.61
State Agency Directors	State Survey Email Invitation	B.5	\$54.26	\$230.61
State Agency Directors	Census Follow-up Email 1*	B.7	\$54.26	\$48.83
State Agency Directors	Census Follow-up Email 2*	B.7	\$54.26	\$43.41
State Agency Directors	Census Follow-up Email 3*	B.7	\$54.26	\$37.98
State Agency Directors	Census Follow-up Phone Call 1*	B.9	\$54.26	\$32.56
State Agency Directors	Census Follow-up Phone Call 2*	B.9	\$54.26	\$21.70
State Agency Directors	Census Follow-up Phone Call 3*	B.9	\$54.26	\$10.85
State Agency Directors	State Agency Survey	B.12	\$54.26	\$2,767.26
Sub-total for Survey of State Agencies			\$54.26	\$3,423.81
Sub-total for State Agencies			\$54.26	\$3,942.53
School Food Authorities				
Cognitive Pre-Testing				

Type of Respondent	Data Collection Activity/Instrument	Attachment ID	Hourly Wage	Total Annualized Cost Burden
SFA Directors	Recruitment Email		\$26.95	\$15.09
SFA Directors	Recruitment Phone Call		\$26.95	\$12.94
SFA Directors	Interviews		\$26.95	\$485.10
Sub-total for Cognitive Pre-Testing			\$26.95	\$513.13
Survey				
SFA Directors	Advance Notice to SFA Directors		\$26.95	\$5,433.12
SFA Directors	SFA Survey Email Invitation		\$26.95	\$5,433.12
SFA Directors	Survey Follow-up Email 1^		\$26.95	\$1,188.50
SFA Directors	Survey Follow-up Email 2^		\$26.95	\$1,052.40
SFA Directors	Survey Follow-up Email 3^		\$26.95	\$916.30
SFA Directors	Survey Follow-up Phone Call 1^		\$26.95	\$780.20
SFA Directors	Survey Follow-up Phone Call 2^		\$26.95	\$525.53
SFA Directors	Survey Follow-up Phone Call 3^		\$26.95	\$270.85
SFA Directors	SFA Survey		\$26.95	\$55,010.34
Sub-total for Survey of School Food Authorities			\$26.95	\$70,610.35
Sub-total for School Food Authorities			\$26.95	\$71,123.48
Grand Total Reporting Burden			-	\$75,066.01

A.13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORD KEEPERS

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.

No capital/startup or ongoing operational/maintenance costs are associated with this information collection.

A.14. ANNUALIZED COST TO FEDERAL GOVERNMENT

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 period of performance for the project is September 23, 2014, through March 01, 2019 (approximately four and half years). The contract cost to the Federal Government is a fixed price award, valued at \$1,099,787.00. This leads to an average annual cost of \$249,008.38. This total includes costs associated with the study design, instrument development, technical development of survey forms, information collection, data analysis, reporting, and presentation/publication of the results. Of the total cost (\$1,099,787), approximately \$448,789.00 will be used for data collection, including pre-tests of survey instruments, Web surveys, and quality control reviews.

This information collection also assumes a total of 3,030 hours of Federal employee time for a General Schedule (GS)-12, Step 5 Senior Analyst at \$33.72 per hour, for a total of \$127,502.40. The 3,030 hours comprises 1,020 of FNS regional office employee time expended during recruitment and 2,010 to be expended by FNS Head Office employees throughout the remaining information collection. We use the 2016 GS base rates from the Office of Personnel Management (OPM)⁸ for both regional and Head Office FNS employees. The total cost (contract + FNS costs) is \$1,227,289.40, for an average annual cost of \$272,730.97.

A.15. EXPLANATION FOR PROGRAM CHANGES OR ADJUSTMENTS

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 that will add 2,712 burden hours and 14,912 responses to OMB's inventory as a result of program changes.

⁸ Federal Employee General base schedule 2016 hourly rates used. Available online at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf.

A.16. PLANS FOR TABULATION AND PUBLICATION AND PROJECT TIME SCHEDULE

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

FNS is primarily interested in the data elements of existing SFA and State agency MIS that States currently are not required to report to FNS. Data from the surveys will be used to provide descriptive statistics of the MIS systems of SFAs and a regression analysis, which will examine the factors associated with the adoption of MIS by SFAs. The data from the survey will include both continuous and categorical variables. For continuous variables, such as number of employees that use the MIS, the analysis will include an examination of frequency distributions along with means, medians, and standard deviations.

The descriptive analyses will examine characteristics of MIS such as:

1. The use of electronic MIS for administrative functions by SFAs;
2. The number of administrative functions for which SFAs use existing MIS; and
3. The type of administrative functions for which SFAs typically use MIS.

In addition to the characteristics of the MIS, we will also analyze the types and frequency of technical assistance and support, if any, that SFAs receive from their respective State Child Nutrition agencies or software vendors.

FNS will produce descriptive analyses that will test for differences among the following sub-groups:

1. Size of SFA (Small, Medium, and Large), and
2. SFAs that operate at least one school under the Community Eligibility Provision (CEP) or Provision 2/3.

The study will develop six data products:

1. A final report and accompanying Excel table appendix summarizing both the State survey and SFA survey results
2. Final briefing presentation materials
3. State survey restricted use data files and documentation
4. State survey public use data files and documentation
5. SFA survey restricted use data files and documentation
- 6. SFA survey public use data files and documentation**

Table A.3 outlines the schedule for the remaining project activities that will lead to these products.

Table A.3 Project Timeline

Activity	Expected Activity Period
Develop Recruitment Materials	June 2015 – September 2016
Compile and Select SFA Survey Sample from FY 2014-2015 School Year; Compile State Survey Primary Contact Information	October 2016
Prepare Training Packages and Data Collection Manuals	September – December 2016
OMB Approval Anticipated	End of November 2016
Notify State Agencies of State Agency Survey; Select and Recruit SFA Sample	December 2016 – January 2017
Recruit and Train Data Collectors and/or Processors	January 2017
Conduct Data Collection	January – May 2017
Summary Report on SFA Recruitment	June – July 2017
Create Database and Analyze Data	May – July 2017
Final Report	July – November 2017
Prepare and Submit Data Files	July – December 2017
Presentation to FNS	October – December 2017

Activity	Expected Activity Period
Publication Version of Final Report, Data and Analysis Files	June – July 2018

A.17. REASON(S) DISPLAY OF OMB EXPIRATION DATE IS INAPPROPRIATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

FNS will display the expiration date of OMB approval and OMB approval number on all instruments associated with this information collection, including forms and questionnaires.

A.18. EXCEPTIONS TO CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS

Explain each exception to the certification Statement identified in Item 19 “Certification for Paperwork Reduction Act.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.