

**Supporting Statement for
USDA Professional Standards Training Tracker Tool (PSTTT)**

OMB No.: 0584-NEW

Project Officer: Kaushalya Heendeniya

U.S. Department of Agriculture

Child Nutrition Programs, FNS

3101 Park Center Drive, Suite 1034

Alexandria, VA 22302

(703) 305-0037

Table of Contents

Supporting Statement – Part A.....	3
1. Circumstances That Make The Collection Of Information Necessary.	3
2. Purpose And Use Of The Information	3
3. Use Of Information Technology And Burden Reduction.....	8
4. Efforts To Identify Duplication.	9
5. Impacts On Small Businesses Or Other Small Entities	9
6. Describe the Consequences Of Collecting the Information Less Frequently.....	10
7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....	11
8. Comments to the Federal Register Notice And Efforts For Consultation.....	12
9. Explain Any Decision To Provide Any Payment Or Gift To Respondents.....	14
10. Assurances Of Confidentiality Provided To Respondents	14
11. Justification For Any Questions Of A Sensitive Nature.....	15
12. Estimates Of The Hour Burden Of The Collection Of Information.	15
13. Estimates Of Other Total Annual Cost Burden	18
14. Provide Estimates Of Annualized Cost To The Federal Government.....	19
15. Explanation of Program Changes Or Adjustments	20
16. Plans For Tabulation, And Publication And Project Time Schedule.....	20
17. Displaying The OMB Approval Of Expiration Date	20
18. Exceptions To The Certification Statement Identified In Item 19	20

Appendices

APPENDIX A- The Healthy Hunger Free Kids Act of 2010 (Section 306)	
APPENDIX B - USDA Professional Standards Training Tracker Tool Screenshots	
APPENDIX C – USDA Professional Standards Training Tracker Tool Burden Estimates Table	
APPENDIX D – Training Video Mockups	
APPENDIX E – USDA Professional Standards Training Tracker Tool User Guide (DRAFT)	
APPENDIX F – Final Comments to 81 FR 38658 pps 38658-38659	
APPENDIX G – FNS Responses to Final Comments to 81 FR 38658 pps 38658-38659	
APPENDIX H.1 - Comments Submitted by USDA Professional Standards Training Tracker Tool Workgroup Part 1	
APPENDIX H.2 - Comments Submitted by USDA Professional Standards Training Tracker Tool Workgroup Part 2	
APPENDIX H.3 - Comments Submitted by USDA Professional Standards Training Tracker Tool Workgroup Part 3	
APPENDIX I - USDA Professional Standards Tracking Tool (PSTTT) Team Members – FY 2016	
APPENDIX J.1 - Professional Standards Training Tracker Tool (PSTTT) Privacy Documentation Checklist	
APPENDIX J.2 – Privacy Threshold Analysis Professional Standards Training Tracker Tool (PSTTT)	
APPENDIX K- E-Authentication Guidance for Federal Agencies OMB M04-04	

Supporting Statement – Part 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 Professional Standards Training Tracker Tool (PSTTT) is being developed by the Nutrition, Education, Training and Technical Assistance Division of the Food and Nutrition Service (FNS). The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals. In addition to hiring standards, mandatory annual training will be required for all individuals involved in preparing school meals (See Appendix A). To meet the training requirements and assist in keeping track of training and training courses, FNS is developing a web-based application tool with a SQL-server database which will be made available to local educational agencies and school food authorities through the FNS public website, with a login authentication. These resources will facilitate compliance with HHFKA requirements and will be provided at no cost to the state, district, or individuals. See Appendix B for sample screenshots of the PSTTT.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.**

The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See Appendix A). The rule, published March 2, 2015, requires a minimum amount of annual training hours for all State agency personnel (state directors of school nutrition programs and state director of distributing agencies) and school nutrition professionals (school nutrition program directors, managers, and staff). All school and State agency nutrition professionals are responsible for meeting their own training requirements. A manager can monitor to ensure his/her employees are meeting their requirements. The rule requires each school food authority to maintain records that annually documents compliance with the professional standard requirements for all school nutrition program employees.

Documentation must be adequate to support to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards. For their ease, SFAs and SAs have the option to use a tracking tool (such as USDA's PSTTT) to assist in keeping track of the training activities. With a tool such as PSTTT, a SFA or SA may generate annual records for verification of training completed.

Documentation such as copies of the training agenda, sign-up sheets, and other paper documents are also acceptable. Each SFA decides how to maintain the records to document training completion.

Required training topic areas will vary according to position and job requirements. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals. To meet the training requirements and assist in keeping track of training and training courses, FNS is developing a web-based

application tool with a SQL-server database which will be made available to local educational agencies and school food authorities through the FNS public website.

Using the PSTTT will support State and school nutrition professionals to keep track of their training hours. By tracking their success, employees are motivated to build their skills and empower staff to lead and efficiently operate school nutrition programs. School food authority-level compliance with the professional standards is now included as a part of the Administrative Review (AR) conducted by State agencies every three years. The ARs are done on the current school year, but may look back on previous year. The AR is a comprehensive off-site and on-site evaluation of all school food authorities participating in the National School Lunch Program, School Breakfast Programs and other Federal school nutrition programs. As a feature of the PSTTT, generated reports can be easily viewed during the AR by State agency personnel to verify compliance with the required annual training hours. While the requirement for the annual training hours is mandatory, using this tool to track the training is voluntary. Users can enter their training as often as necessary to log in training to meet the required hours for their position. State and local school district nutrition professionals can use other means to track their training. FNS envisions the web application will be used by an audience (school nutrition professionals and state agency personnel) that varies widely in technical resources and knowledge, and the web application should be intuitive to use and should be accessible to all local school districts. In addition, it was a contractual requirement for the vendor to develop a mobile friendly version of this PSTTT application to ensure easy usage and accessibility across mobile devices. This allows users to enter their training information

at their pace either directly after a training has been completed or at a later time and date. Training (See Appendix D), along with a user guide (See Appendix E) on using the PSTTT will be provided and available on the PSTTT web site. This training is meant to equip the users with the tools and knowledge needed to assist in using the PSTTT.

Create Profile

The user will be able to create a user profile with the following information; only the school information is verified by FNS:

- School District/Address
- School Name/Address
- School Nutrition Professional - Contact Information/Email address
- Title of School Nutrition Professional or Role in School Nutrition program
- Hiring Date

The user will be logging in the following information:

- Key Area
- Training Topic
- Learning Objective
- Training Title
- Training Hours/Minutes
- Date of Training
- Provider or Organization offering training, including state, local or national
- Level of Training by employee position (e.g. employee, manager, etc.)

The new PSTTT has multiple time saving features available that will be helpful for users. This tool will provide a list of trainings in the database that users can select and the course information and training hours will auto-populate. Users will also be able to enter in multiple learning objectives or training topics for one-single training. Managers will be able to enter trainings for multiple employees at the same time. They also will be able to recommend specific trainings for their staff. This tool will show managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement. The new online version will also provide other great features, such as: running reports, editing files, auto-populating school contact information (available through school database where data is imported from the National Center for Education Statistics (<https://nces.ed.gov/ccd/elsi/tableGenerator.aspx>)), and ability to export and save results in multiple file formats, including PDF (.pdf), Excel and Word 2000 or higher (.docx). It will have a user-centered, simple, intuitive interface, making this tool more user-friendly and easy to navigate.

Information Logged In

The user will be logging the following information: key area, training topic, learning objective, training titles, training hours/minutes, date of training, provider of training, and level of training by employee position.

Reports

Summary and detailed reports can be generated by the user and will display completed hours of training to be used during the AR. The reports can be a summary of one or more

employees at a time by providing quick glance of their status with the annual training requirement. Additionally, the detailed report can provide information on individuals or all staff pertaining to training hours that can be grouped by training topics and objectives, certificates of completion, date range, etc.

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.

Data collection is 100 percent electronic. Users can create a profile using the following information: school district/address, school name/address, individual name, email address, title of their position, and hiring date. Managers will be able to create user profiles for their own employees. In addition, there will be a mobile friendly version of this PSTTT application to ensure easy usage and accessibility across mobile devices. The application will be compatible with all mobile operating systems (iOS, Android, and Windows).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

There is no similar information collection. This is USDA's first and only web based tool to track professional standards. The previous version (USDA Professional Standards Training Tracker Tool Version 1) was a downloadable application. The new web based tool version will replace the first downloadable version. The new version was developed to address feedback received from Version 1.0 users. FNS solely administers and monitors the Administrative Review process.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information. The new PSTTT has multiple time-saving features that will be helpful for users. This tool will provide a list of trainings in the database that users can select and the course information and training hours will auto-populate. Users will also be able to enter in multiple learning objectives or training topics for one single training. Managers will be able to enter trainings for multiple employees at the same time. This tool will show managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement. The new online version will also provide other great features, such as: running reports, editing files, auto-populating

school contact information (from school database built based on data imported from National Center for Education Statistics (<https://nces.ed.gov/ccd/elsi/tableGenerator.aspx>)), and ability to export and save results in multiple file formats, including PDF (.pdf), Excel and Word 2000 or higher (.docx). It will have a user-centered, simple, intuitive interface, making this tool more user-friendly and easy to navigate.

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 Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See Appendix A). As part of the Professional Standards requirements for school nutrition professionals and State agency personnel, State reviewers will have instant access to the PSTTT to obtain information for the AR. By school nutrition professionals regularly entering their training information, State reviewers can gather information for the AR before going onsite to the School Food Authority. This time-saving feature reduces the time the reviewer would have to spend at the facility. It also reduces the review time by having all the information in one location and not having to review multiple sheets of paper. Additionally, school foodservice directors or authorized personnel may regularly peruse their staff accounts to ensure trainings are recorded regularly. The previous version of the PSTTT was a downloadable application with limited capabilities. The PSTTT was designed in response

to feedback received from users regarding adding features for managers to add employees; upload training certificates, handouts, etc.; easily view the status of each of their staff's required hours; easily send notifications from the PSTTT to staff; and more comprehensive reporting capabilities.

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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A notice was published in the Federal Register on June 14, 2016, Volume 81, pages 38658-38659. The comment period ended on August 15, 2016. One group (School Nutrition Association Task Force) submitted multiple comments concerning the practical utility of the information, the accuracy of the agency's estimate, ways to enhance the quality, utility, and clarity of the information to be collected, and ways to minimize the burden of the collection of information (Appendix F). The FNS response to the comment is also included in this package (Appendix G).

Prior to submission, the PSTTT Work Group, consisting of external members, and additional stakeholders, had opportunities to provide comment and input by email or during conference calls on the design and development of the tool. These comments were considered and some were implemented (See Appendices H.1 through H.3). A list of work group members, external members, and additional stakeholders can be found in Appendix I.

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

No payment or gift will be provided to respondents.

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

The Department complies with the Privacy Act of 1974. Privacy Impact Assessment (PIA) and Privacy Threshold Analysis (PTA) were prepared, submitted to, and approved by FNS Privacy Office (See Appendices J.1 and J.2). Privacy safeguards can be found in the PIA under Section 8.0. Employees can create their user profiles after receiving confirmation from USDA's eAuthentication. The E-Authentication Guidance for Federal Agencies OMB M04-04 (See Appendix K) requires that each and every transaction accomplished by the public in an IT system be evaluated to determine if the level of authentication is sufficient for the transaction (business) performed (E-Authentication Risk Assessment). The authentication focuses on confirming a person's identity, based on the reliability of his or her credential. Authorization focuses on identifying the person's user permissions. M04-04 is concerned with authentication (See Attachment K). A System of Records Notice (SORN) is not required for PSTTT since it is not collecting PII or retrieving information by personal identifiers. A SORN covering eAuthentication, titled USDA.OCIO-2 eAuthentication Service was published in the Federal Register on March 14, 2012 (Vol. 77, pp 15024-15026). The eAuthentication is providing the overall security for accessing FNS systems. Some school nutrition professionals may not have access to computers. Therefore, managers can create accounts for employees who are unable to create their own. Managers have access to log in training hours to their designated employees. Only managers can search and add his/her employees (who have already created a profile) to their employee roster. A school manager can only add an employee that is in the same school/district and State agency managers can only add an user that is in their state.

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 involve questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. 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.

Estimated Number of Respondents: The total estimated number of respondents is 10,006. This includes 6 State agency personnel and 10,000 school nutrition professionals who voluntarily choose to utilize this tracking tool. We estimated that 10% of the universe of States, including territories, (rounding up) and 10% of 100,000 school nutrition professionals, would use the tool. All respondents will

be offered a 60-minute training webinar. Respondents are also able to voluntarily submit their trainings to be included in the Professional Standards Training Database.

Estimated Number of Responses per Respondent: Overall, the total estimated number of responses per all the respondents in the entire collection is seven. This is calculated by dividing the total annual responses for this collection (70,042) by the total number of respondents for the collection (10,006), as shown in Appendix C USDA Professional Standards Training Tracker Tool Burden Estimates Table. This calculation is based upon the estimated number of annual responses for the specific activities associated with this tracking tool, which are performed by both state agency personnel and school nutrition professionals. Both respondent groups will first be required to create their user profile which will be saved for future use. We further estimate that these users will be updating and managing their records on a quarterly basis, for a total of 5 responses annually per respondent for using the tracking tool. In addition, we estimate that the estimated number of responses per respondent for the training webinar and the training submissions will be one each for both the state agency personnel and the school nutrition professionals. Please refer to Appendix C for further information.

Estimated Total Annual Responses: 70,042. This estimate was based on the number of times per year that we expect the 6 state agency personnel and the 10,000 school nutrition professionals using the tracking tool to create their user profiles, update and manage their records, create training submissions and attend training webinars concerning the tracking tool. It is the sum of all of the

responses for this collection, and is calculated by multiplying the estimated number of respondents by the estimated annual responses per respondent for each activity performed by the state agency personnel and the school nutrition professionals. Please refer to the preceding two paragraphs and Appendix C for additional information.

Estimated Time per Response: The estimated time per response across the entire collection is approximately 14 minutes (0.24 hours). For the training tracking tool, the estimated time of response varies from five to ten minutes depending on familiarity of the tool and the amount of reports created with an average estimated time of 7.5 minutes (0.125 hours) for all participants. The training webinar of 60 minutes (1 hour) will be available for all participants. If a respondent voluntarily chooses to submit a training to be included in the Professional Standards Training Database, the estimated time to submit a description of the training with the attached training to be reviewed by FNS should not exceed 5 minutes (0.083 hours).

Estimated Total Annual Burden on Respondents: 17,090.25 hours (rounded to 17,090 hours). See the table (Appendix C) for estimated total annual burden for each type of respondent.

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

The estimate of respondent cost for PSTTT is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2015 National Occupational and Wage Statistics (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage is \$14.70 for elementary and secondary food preparation workers (Occupational Group 35-9099) and \$20.53 for State education occupations (Occupational Group 25-0000). With approximately 80% food preparation users and 20% State agency users, the combined wage for this entire group of users is approximately \$15.87 per hour. The estimated annualized cost to respondents is \$271,222.27 calculated as follows:

$$\text{TOTAL COST TO THE PUBLIC} = 17,090.25 \times \$15.87 = \$271,222.27$$

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 questions 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.

14. Provide estimates of annualized cost to the Federal government. 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 estimated annualized cost to the Federal government is approximately \$911,922. The cost estimate for three federal employees is based on a 40% effort (or 1.2 full-time equivalents) at the GS-13 Step 5 average salary in the Washington, DC locality per OPM’s 2017 pay charts. Federal employees are the subject matter experts on Professional Standards, FNS programs, and customer expectations, whereas contract staff are responsible for managing the technical aspects of the tool, such as developing, launching, training, and maintaining it with federal employee oversight.

This estimate is based on the following:

Annual server hosting and maintenance cost:	\$485,000.00
Three Federal employees*	\$128,922.00
Contract Staff** (development of tool)	\$ 298,000.00
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Subtotal:	\$911,922

* 1.2 Full-Time Equivalents of GS-13 Step 5 salary using 2017 OPM Pay Chart in Washington DC locality

** Cost of awarded contract

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 17,090 burden hours and 70,042 responses to OMB's inventory.

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

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

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.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I "Certification for Paperwork Reduction Act."

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I. There are no exceptions to the certification statement being requested.