

**Supporting Justification for OMB Clearance for the  
Child Nutrition Program Operations Study II (CN-OPS-II)**

**OMB # 0584-0607**

**Part A**

**March 31, 2017**

**Office of Policy Support  
Food and Nutrition Service  
United States Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22302  
Project Officer: Devin Wallace-Williams  
Telephone: 703-457-6791  
Email: [Devin.Wallace-Williams@fns.usda.gov](mailto:Devin.Wallace-Williams@fns.usda.gov)**

## Table of Contents

<b>Part A: Justification</b> .....	A-3	
Terms of Clearance.....	A-3	
Introduction.....	A-3	
A.1	Circumstances That Make the Collection of Information Necessary.....	A-4
A.2	Purpose and Use of the Information.....	A-7
A.3	Use of Information Technology and Burden Reduction.....	A-12
A.4	Efforts to Identify Duplication and Use of Similar Information....	A-12
A.5	Impact on Small Businesses or Other Small Entities.....	A-13
A.6	Consequence of Collecting the Information Less Frequently.....	A-13
A.7	Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....	A-13
A.8	Comments in Response to Federal Register Notice and Efforts to Consult Outside Agency.....	A-14
A.9	Explanation of Any Payment or Gift to Respondents.....	A-16
A.10	Assurance of Confidentiality Provided to Respondents.....	A-16
A.11	Justification for Sensitive Questions.....	A-16
A.12	Estimates of Annualized Burden Hours and Costs.....	A-17
A.13	Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers .....	A-20
A.14	Annualized Cost to the Federal Government.....	A-20
A.15	Explanation for Program Changes or Adjustments.....	A-21
A.16	Plans for Tabulation and Publication and Project Time Schedule.	A-22
A.17	Reason(s) Display of OMB Expiration Date is Innapropriate.....	A-24
A.18	Exceptions to Certification for Paperwork Reduction Act Submission.....	A-24

### Tables

Table A.1.	Estimates of Respondent Burden.....	A-18
Table A.2.	Annualized Cost to Respondents.....	A-19
Table A.3.	Data Collection Schedule.....	A-23

### Appendices

A1	Research Issues and Research Questions
B1	Email Notification to Regional Offices
B2	Invitation Letter to State Agency Child Nutrition Directors/Frequently Asked Questions (FAQs)/Web Survey Information Sheet
B3	Follow-Up EMail to State CN Directors
B3.1	CN Director Reminder Email

B4.1	CN Director Telephone Reminder Scripts
B5	Thank You Letter to State CN Director for Completing the CN-OPS II Survey
B6	Email Notification to State Child Nutrition Directors List of Participating SFAs and Frequently Asked Questions (FAQs)
B7	Invitation Letter to SFA Directors, Frequently Asked Questions (FAQs) and Web Survey Information Sheet
B8	Follow-Up E/Mail to SFA Directors
B8.1	SFA Director Reminder Email
B8.2	SFA Director Telephone Reminder Scripts
B9	Thank You Letter to SFA Director for Completing the CN-OPS II Survey
C	State Child Nutrition Director Survey Year 2
D	School Food Authority Director Survey Year 2
E.1	Comments from 60-Day Federal Register Notice to FNS
E.1.1-E.1.4	Comments from 60-Day Notice
E.2	FNS Response to Comments
E.2.1-E.2.3	FNS Responses to Comments
E.3	Comments from the National Agricultural Statistics Service
F.1	Section 28 of the Richard B. Russell National School Lunch Act Amended Through February 2014
F.2	Section 305 of the Healthy Hunger-Free Kids Act of 2010
G	Table of Estimated Burdens
H	2M Research Services, LLC Employee Nondisclosure Agreement

## **PART A: JUSTIFICATION**

### **Terms of Clearance**

In approving the information collection request for the first year of the Child Nutrition Program Operations Study II (CN-OPS-II) (OMB Number 0584-0607; Expiration 4/30/2019), OMB requested that FNS share with OMB nonresponse bias and standard error analytical results during the data analysis and reporting phase each year, prior to publication of findings. The Year 1 Notice of Action results were sent to OMB on January 9, 2017. The results of Years 2, 3, and 4 will be shared with OMB annually, starting with the Year 2 analysis in the first quarter of Federal FY 2018.

### **Introduction**

The Food and Nutrition Service (FNS) at the United States Department of Agriculture (USDA) administers Federal child nutrition food programs that provide nutritionally balanced meals and snacks to eligible children through 18 years of age.<sup>1</sup> The Child Nutrition (CN) programs include five major food assistance programs operating in schools: the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Fresh Fruit and Vegetable Program (FFVP), and the Special Milk Program (SMP). These programs are designed to improve the nutritional quality of participating children's diets. Eligibility to participate for free or at a reduced price is based on family income. Children living in families earning at or below 130 percent of the Federal poverty level (FPL) qualify for free meals (\$31,590 for a family of four during the period July 1, 2016 through June 30, 2017); those living in families with incomes between 130 percent and 185 percent of FPL pay a reduced price for meals (185% of FPL is \$44,955 for a family of four during the period July 1, 2016 through June 30, 2017); those living

---

<sup>1</sup> Adults enrolled in school up to age 21 may participate in the school meals programs and persons under the age of 21 currently admitted to Residential Child Care Institutions (RCCI) as residents are also eligible to participate in the Federal CNPs.

in families with incomes above 185 percent of FPL pay full price for school meals. The CN programs provide a safety net for school-age children, with increasing emphasis on improving their nutritional status. In 2014, NSLP provided lunch and after-school snacks to more than 30 million students each day in over 99,000 schools and residential child care institutions nationwide, while SBP provided breakfast to 13.5 million students each day in approximately 89,000 schools and residential child care institutions.

**A.1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

**Circumstances that make the collection necessary.** This information collection request is for a revision of the approved collection for the Child Nutrition Program Operations Study II (CN-OPS-II) (OMB Number 0584-0607, Expiration Date: 04/30/2019). This OMB Package is for planned data collection activities for school year (SY) 2016–17, SY 2017–18, and SY 2018–19. This collection is necessary to provide up-to-date information about the CN programs’ operations over the 4-year period from SY 2015–16 through SY 2018–19. Along with the information already collected on SY 2015–16, the additional information will enable FNS to report the participation in the CN programs and better understand and address policy issues related to the CN programs’ operations. The policy and operational issues include, but are not limited to, the preparation of the program budget, development and implementation of new program policies and regulations, and identification of areas for technical assistance and training to improve operations and adherence to program regulations. Specifically, this study will help FNS obtain:

- general descriptive data on the CN programs’ characteristics to help FNS respond to questions about the CN programs in schools;

- data related to program administration for designing and revising program regulations, managing resources, and reporting requirements; and
- data related to program operations to help FNS develop and provide training and technical assistance for School Food Authorities (SFAs) and State Agencies (SAs) responsible for administering the CN programs.

The ultimate goal is to analyze these data to describe and assess program operations, provide input for new legislation on the CN programs, and develop pertinent technical assistance and training to program implementation staff.

Annual information on the CN programs is necessary for FNS to understand how recent and proposed legislation, regulations, policies, and initiatives change the operations in the CN programs. Additionally, FNS requires one-time snapshots of aspects of operations that are of special interest at a particular point in time. Therefore, CN-OPS-II was designed as a set of data collection modules. Each module facilitates data collection on an aspect of the CN programs. The modules can be used biennially or once during the study period for aspects of the CN programs that require just a 1-year snapshot of information. Such a data collection system enables FNS to collect cross-sectional and longitudinal data (using selected modules or varying modules at different time points) and to, therefore, respond more quickly and effectively to requests for policy-relevant analyses. In addition, the grouping of related topics and recurring nature of the survey will reduce FNS' information collection costs, lessen respondent burden, and reduce the data collection period because the survey modules can be completed by those at the State or SFA with particular expertise to answer particular modules. Included with this package are the research questions for Years 1, 2, 3, and 4 (Appendix A.1) and the survey

instruments for Year 2 (Appendices C and D). Some modules are common in all 4 years, while others may be common in just 2 or 3 years or only appear in 1 year. A limited number of new modules may be created for Years 3 and 4 to address an emerging issue within the CN programs or clarify findings from a previous year. In such cases, all new content will be pretested and burdens estimated. FNS anticipates that the burden on respondents in Years 3 and 4 will be the same as the burden reported in Question A.12 for Year 2. Therefore, to the extent that new modules are added, existing modules will be removed or shortened and an Information Collection Request will be prepared and submitted to OMB for review of any new content and changes to existing content.

**Legal or Administrative Requirements.** This study is necessary to implement Sec. 28(a)(1) of the Richard B. Russell National School Lunch Act (Appendix F.1). This legislation directs the USDA to carry out annual national performance assessments of the SBP and the NSLP.

**SEC. 28. (42 U.S.C. 1769i) PROGRAM EVALUATION.**

“(a) PERFORMANCE ASSESSMENTS.—

(1) IN GENERAL.—Subject to the availability of funds made available under paragraph (3), the Secretary, acting through the Administrator of the Food and Nutrition Service, may conduct annual national performance assessments of the meal programs under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.).”

Furthermore, the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law 111-296, Sec. 305) amended Section 28 of the Richard B. Russell National School Lunch Act by adding the following (Appendix F.2):

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

**A.2 Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

**How the information is to be used.** The information will be used to answer the research questions presented in Appendix A.1 in two ways. First, the information will be used to describe the trends in the CN programs’ participation and operational practices, as well as aspects of particular operations in a single year. Second, the information will be used to assess how the CN programs’ participants are responding to new and recent legislative and policy changes. Statistics, specifically percentages and means, will be calculated from the responses to the survey questions. Percentages will be calculated for all choice questions, while means will be presented for financial responses including meal prices, revenues, and expenditures. The statistics will be calculated using weighted data, such that all results will provide national estimates. These estimates will provide information to help answer the research questions in A.1. Some research questions will require descriptions of SFAs according to characteristics such as the geographic region, organizational size, location in urban, suburban, or rural areas, and percentage of students eligible for free and reduced price school meals. All statistics will be presented in tables and charts with associated text that explains how the estimates address each research question. The



tables, charts, and associated text will be organized into final reports that will be made available to the public. Upon completion, interested individuals will be able to access the final report electronically on the USDA FNS website and browse all content areas.

**From whom the information will be collected.** The information will be collected from a nationally representative sample of approximately 2,188 SFA directors each year who administer the CN programs at the local level, and from a census of the 55 State Child Nutrition (CN) directors who administer these CN programs at the State level. The selected SFA and CN directors will be notified of the language in HHFKA (Public Law 111-296, Sec. 305) so as to encourage their cooperation in studies of the CN programs. However, there is no requirement to complete a survey to continue participation in the CN programs or to receive any Federal benefits.

**How the information will be collected.** The information will be collected through two web-based surveys: (1) the CN Director Survey, and (2) the SFA Director Survey. Accommodations will be made for directors who prefer to complete their survey via either hard copy (regular mail) or computer-assisted telephone interview (CATI).

The CN Director Survey will begin with an email notification to all FNS Regional Offices (ROs) asking them to alert the State CN directors in their region about their important role in the CN-OPS-II study (Appendix B1). All CN directors will then be mailed an invitation letter (Appendix B.2), requesting their participation in the study. The mail package will include a hard copy of the survey instrument (Appendix C) for planning purposes. The package will also contain instructions on how to access the web survey, as well as information about the toll-free help line and email help desk. The help desk telephone number is 1-866-465-7738, and the email help desk address is support@2mresearch.com. Help will be provided by a professional survey

support specialist during regular business hours. Given the breadth and depth of information to be collected through these surveys, CN directors will be able to share login information with associates who may be assigned to complete particular modules, and may save their progress, facilitating completion of the survey in more than one session. Approximately 1 week after the mailing, a follow-up email will be sent to the CN directors who have not responded to the invitation letter (Appendix B3). This follow-up email will confirm that the package arrived and include information on accessing the survey and the telephone and email help desks. A reminder email will be sent once every 2 weeks to the CN directors who have not completed their survey (Appendix B3.1). If the web survey is not completed within 7 weeks after the initial questionnaire is received, then trained interviewers will call CN directors and remind them to complete their survey (Appendix B4.1). The interviewers will offer assistance if needed and offer to complete any modules that the director is ready to complete over the phone. Re-contact will occur weekly (Appendix B3.1, B4.1) until they respond or the end of the survey period, at which time all participants will be mailed a thank you letter (Appendix B5). The data collection period for the CN Director Survey will span 10 weeks. If a respondent returns a completed hard copy of the survey, the responses will be entered into the database by a survey support specialist. From prior experience with web-based surveys with telephone follow up, FNS expects that 90 percent of the responses will be received electronically.

The SFA Director Survey will begin with an email notification to all CN directors notifying them that the contractor will soon begin to contact the selected SFAs in their State (Appendix B6). All sampled SFA directors will be mailed an invitation letter (Appendix B7) requesting their participation in the study. The mail package will include a hard copy of the survey instrument (Appendix D) for planning purposes. The package will also contain

instructions on how to access the web survey, as well as information about the dedicated toll-free help line and email help desk. Help will be provided by a professional survey support specialist during regular business hours. Given the breadth and depth of information to be collected through these surveys, SFA directors will be able to share login information with individuals who may be assigned to complete particular modules, and may save their progress, facilitating completion of the survey in more than one session. Approximately 1 week after the mailing, a follow-up email will be sent to the SFA directors who have not responded to the invitation letter. This follow-up email will confirm that the package arrived and include information on accessing the survey and the telephone and email help desks (Appendix B8). Reminder emails will be sent to the SFA directors who have not completed their survey, every 1 to 2 weeks for 8 weeks (Appendix B8.1). If the web survey is not completed within 8 weeks after the initial questionnaire is received, trained interviewers will call SFA directors and remind them to complete their survey (Appendix B8.2). The interviewers will offer assistance if needed and offer to complete any modules that the director is ready to complete over the phone. Re-contact will occur weekly until the end of the survey period (Appendix B8.1, B8.2) at which time a thank you letter will be mailed to the participants (Appendix B9). The data collection for the survey of SFA directors will span 13 weeks.

**Frequency of information collected.** All CN directors and sampled SFAs will be asked to complete their respective survey once in SY 2016–17. Different samples of approximately 2,188 SFAs will participate in SY 2017–18 and SY 2018–19. Because the CN Director Survey is a census of State directors, they will be asked to participate every year. Sampling procedures will be implemented to reduce the probability that SFAs will be asked to participate in more than 1 year of the study. However, some SFAs will be in the sample more than 1 year, owing to both

the statistical requirements of the study and to random selection procedures (Supporting Statement Part B).

The current collection is a revision of a series of collections, most recently the Special Nutrition Program Operations Study (OMB Number 0584-0562, expiration date 4/30/16). Data from this series is used by FNS to describe participation in CN programs and to develop cost estimates on, for example, meal pricing and revenue generated by reimbursable school meals since HHFKA. The series has also been used to provide insight into the challenges faced by SFAs in implementing the new meal pattern requirements and to address several sections of HHFKA. Year 2 of CN-OPS-II has the same requirements as Year 1. Some information collected from Year 1 (SY 2015-16) must be updated to SY 2016-17. Therefore, some survey questions from Year 1 are included in the Year 2 surveys. Other questions from the Year 1 surveys have been replaced with questions specifically designed to answer new research questions for Year 2. While these changes have not changed the burden for the SFA Director survey, FNS estimates that it will now take two hours to complete the CN Director Survey instead of one hour as estimated for Year 1.

**Information shared with any other organizations inside or outside USDA or the government.** The aggregated and analyzed data will be published and be available to the public via the FNS Office of Policy Support, without identification of SFA-level responses or any individual respondents. All results will be presented in aggregated form in the final report made available in the research section of the USDA FNS website

<http://www.fns.usda.gov/ops/research-and-analysis>.

**A.3 Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

FNS is committed to complying with the E-Government Act of 2002, to promote the use of technology. The surveys of the CN and SFA directors will be web surveys and participants will be recruited by email with embedded links to ease login to the survey system. The CN and SFA directors will be contacted by telephone to encourage and remind them to complete the survey and to try to get a commitment of a date by which they will complete the survey. Those that do not complete the web survey will be contacted by telephone, and data may be collected with a computer-assisted telephone interviewing (CATI) survey mode. Because the participants will receive a hard copy of the survey for planning purposes, there is a chance that some may fill that out and return it. However, previous experience with web-based surveys with telephone follow up indicate that 90 percent of the total responses (approximately 11,105 out of 12,339 total responses per year) will be electronic—either completed over the web or via CATI.

**A.4 Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. Some questions in the survey have been drawn and modified from prior FNS studies to collect updated information because the prior information is obsolete. No questions will collect duplicate information and, to our knowledge, there is no similar information available or being collected for the current timeframe.

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

Information being requested or required has been held to the minimum required for the intended use. Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. FNS estimates that 1 percent of our respondents are small entities, approximately 23 respondents per year.

**A.6 Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The proposed data collection plan calls for data collection from SFA directors and CN directors once during the school year. Gathering such data is essential to track the characteristics of the CN programs. In addition, ongoing changes to the programs are accompanied by parallel changes in administrative and operational issues. Collecting the information less frequently would obstruct the Agency's ability to keep abreast of the issues in administration and operation of these programs, thereby delaying the discussion, formulation, and implementation of suitable policies.

**A.7 Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. This collection of information is conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 5 CFR 1320.5.

**A.8 If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

Notice of this study was published in the Federal Register on Tuesday, October 4, 2016 (Vol. 81, No. 192, pp 68398 - 68399). In response to the notice, FNS received an email expressing support for the study from the Academy of Nutrition and Dietetics, an email from Jean Public, a letter (via email) requesting clarification on which CN programs will be included in CN-OPS-II from the National Child and Adult Care Food Program (CACFP) Sponsors Association, and a letter (via email) with comments from the School Nutrition Association (SNA) (Appendix E.1). FNS responded to the email from the Academy of Nutrition and Dietetics, the letter from the National CACFP Sponsors Association, and the letter from the SNA (Appendix E.2).

FNS responded to the email from the Academy of Nutrition and Dietetics with appreciation of their support. In responding to the request from the National CACFP Sponsors Association, FNS noted that while some questions on the SFA survey concern school participation in the CACFP Afterschool at-risk supper programs, strategies to build awareness of

CACFP, and SFA plans to participate in CACFP in the future, no CACFP staff members or students will participate in this data collection.

SNA commented that the stated burden for the pretest may be too low and that some SFA Directors in the Special Nutrition Programs Operations Study (OMB Number 0584-0562, expiration date 4/30/16) during SY 2012-13 and SY 2013-14 reported burden that was higher than estimated. In its response, FNS explained that the estimated burden of approximately 2 hours for the proposed study was examined and validated during pretesting of the data collection instruments. FNS also noted the additional efforts taken to reduce burden, including: focusing questions on current CN programs policies, allowing the respondent to save answers and then return to the survey to complete additional sections at convenient times, and carefully analyzing each question to ensure that it is necessary to address the study's objectives.

SNA also commented that USDA make every effort to draft clearly written and focused questions. FNS made significant efforts to improve the CN-OPS II surveys from previous data collections and questions were revised to reflect recent changes in CN program policies.

**a. Consultations Outside the Agency**

- In addition to soliciting comments from the public, FNS consulted with Evan Schulz 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.

**A.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.



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

FNS complies with the Privacy Act of 1974. No confidential information will be requested, reported, or maintained as a result of the data collection activities. The CN directors will be informed that their personal information (name, telephone number, etc.) will be kept private, but that their responses about agency operations may be tabulated by State (Appendix B2). The SFA directors will be informed that their personal information will be kept private and that their responses will only be used statistically in creating summary tabulations (Appendix B7). To insure that personal information remains private, the contractor is required to create and keep data on secure networks and utilize data collectors who sign confidentiality agreements binding them to protect private information (Appendix H). The contractor will assign a unique ID number to each response and provide FNS the data by this ID number. A separate file will associate the ID number with personal information. FNS will keep this file private. Once the contract has ended, the contractor will destroy the files with private information.

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

**A.11 Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

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

**A.12 Provide estimates of the hour burden of the collection of information. The statement should:**

- **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.**

Table A1 shows the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials and prior experience in collecting similar data. With this submission, there are 3,379 respondents, 12,339 responses, and 4,099.37 burden hours (3848.3 for all respondents and 251.07 for all non-respondents).

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

Table A2 shows the estimated annualized cost to respondents. The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2015 National Occupational and Wage Statistics, NAICS Code 999001. The estimates use Occupational Group 11-9051 for SFA directors and Occupational Group 11-9199 for CN Directors. The hourly mean wage for 11-9051 (Food Service Managers) is \$25.79 per staff hour, and the hourly mean wage for 11-9199 (Other Management Positions) is \$53.47 per staff hour ([https://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](https://www.bls.gov/oes/current/oes_nat.htm#11-0000)). The total estimated annualized cost on respondents is \$ 110,005.69.

**Table A.1 Estimates of Respondent Burden**

	Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-responsive	
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response
State / Local Government	CN Directors	Hard copy pre-test	N/A	3	3	1	3	3	9	0	1
	CN Directors	Web-based Survey	C	55	55	1	55	2	110	0	1
	CN Directors	Invitation Letter	B2	55	22	1	22	0.05	1.1	33	1
	CN Directors	Follow-up email*	B3	33	13	1	13	0.05	0.65	20	1
	CN Directors	Reminder Email - Week 2*	B3.1	20	8	1	8	0.05	0.4	12	1
	CN Directors	Reminder Email - Week 4*	B3.1	12	5	1	5	0.05	0.25	7	1
	CN Directors	Reminder Email - Week 6*	B3.1	7	3	1	3	0.05	0.15	4	1
	CN Directors	Telephone Reminder - Week 7*	B4.1	4	2	1	2	0.083	0.167	2	1
	CN Directors	Telephone Reminder - Week 8*	B4.1	2	2	1	2	0.083	0.167	0	1
	CN Directors	Thank You Letter	B5	55	55	1	55	0.05	2.75	0	0
	CN Directors	Email Notification & FAQ	B6	55	55	1	55	0.5	27.5	0	0
	SFA Directors	Hard copy pre-test	N/A	6	5	1	5	3	15	1	1
	SFA Directors	Web-based Survey	D	2,188	1,750	1	1,750	2	3,500	438	1
	SFA Directors	Invitation Letter	B7	2,188	656	1	656	0.05	32.80	1,532	1
	SFA Directors	Follow-up email**	B8	1,532	383	1	383	0.05	19.15	1,149	1
	SFA Directors	Reminder Email - Week 2**	B8.1	1,149	287	1	287	0.05	14.35	862	1
	SFA Directors	Reminder Email - Week 5**	B8.1	862	129	1	129	0.05	6.45	733	1
	SFA Directors	Reminder Email - Week 7**	B8.1	733	110	1	110	0.05	5.50	623	1
	SFA Directors	Telephone Reminder - Week 8**	B8.2	623	93	1	93	0.083	7.75	530	1
	SFA Directors	Telephone Reminder - Week 9**	B8.2	530	53	1	53	0.083	4.42	477	1
SFA Directors	Telephone Reminder - Week 10**	B8.2	477	39	1	39	0.083	3.25	438	1	
SFA Directors	Thank You Letter	B9	1,750	1,750	1	1,750	0.05	87.50	0	0	
	<b>TOTAL</b>		<b>2,252</b>	<b>1,813</b>	<b>3.02</b>	<b>5,478</b>	<b>0.703</b>	<b>3,848.30</b>	<b>1,566</b>	<b>4.38</b>	

\* Based on 40 percent response rate for email and telephone reminders until target of 55 respondents are reached.

\*\* Based on declining response rates on subsequent contacts until target of 1,750 respondents is reached. Initial response rate is 30%.

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

**Table A.2 Annualized Cost to Respondents**

Type of respondents	Type of survey instruments	Total Annual hour burden	Hourly Wage	Respondent Cost
<b>CN Directors</b>	Hard copy pre-test	9.00	\$ 53.47	\$ 481.23
<b>CN Directors</b>	Web-based Survey	110.00	\$ 53.47	\$ 5,881.70
<b>CN Directors</b>	Invitation Letter	2.20	\$ 53.47	\$ 117.63
<b>CN Directors</b>	Follow-up email	1.32	\$ 53.47	\$ 70.40
<b>CN Directors</b>	Reminder Email - Week 2	0.80	\$ 53.47	\$ 42.78
<b>CN Directors</b>	Reminder Email - Week 4	0.48	\$ 53.47	\$ 25.84
<b>CN Directors</b>	Reminder Email - Week 6	0.28	\$ 53.47	\$ 15.15
<b>CN Directors</b>	Telephone Script - Week 7	0.23	\$ 53.47	\$ 12.48
<b>CN Directors</b>	Telephone Script - Week 8	0.17	\$ 53.47	\$ 8.91
<b>CN Directors</b>	Thank You Letter	2.75	\$ 53.47	\$ 147.04
<b>CN Directors</b>	Email Notification & FAQ	27.50	\$ 53.47	\$ 1,470.43
<b>SFA Directors</b>	Hard copy pre-test	15.50	\$ 25.79	\$ 399.75
<b>SFA Directors</b>	Web-based Survey	3,536.50	\$ 25.79	\$ 91,206.34
<b>SFA Directors</b>	Invitation Letter	83.87	\$ 25.79	\$ 2,162.92
<b>SFA Directors</b>	Follow-up email	57.45	\$ 25.79	\$ 1,481.64
<b>SFA Directors</b>	Reminder Email - Week 2	43.08	\$ 25.79	\$ 1,111.12
<b>SFA Directors</b>	Reminder Email - Week 5	30.88	\$ 25.79	\$ 796.48
<b>SFA Directors</b>	Reminder Email - Week 7	26.27	\$ 25.79	\$ 677.42
<b>SFA Directors</b>	Telephone Script - Week 8	25.42	\$ 25.79	\$ 655.50
<b>SFA Directors</b>	Telephone Script - Week 9	20.32	\$ 25.79	\$ 523.97
<b>SFA Directors</b>	Telephone Script - Week 10	17.85	\$ 25.79	\$ 460.35
<b>SFA Directors</b>	Thank You Letter	87.50	\$ 25.79	\$ 2,256.63
<b>Total</b>		4,099.37		<b>\$ 110,005.69</b>

**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 annualized cost to the Federal Government is \$445,596.19. The largest cost to the Federal Government is to pay a contractor \$443,508.95 annually to conduct the study. This is based on an estimate of 3,429 hours, with a salary range of \$57.24–\$198.90/ hour. This contract cost includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items. The annualized cost of this information collection also assumes a total of 32 hours annually of Federal employee time: for a GS-12, step 5 (FNS Headquarters) at \$43.29 per hour for a total of \$1,385.28; and 28 hours of Federal employee time: for GS-11, step 1 (FNS Regional Offices) at \$25.07 per hour, for a total of \$701.96 on an annual basis, for a total cost of \$2,087.24. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2017. The Headquarters rate is from the Washington-Baltimore-Northern Virginia wage chart, while the Regional Office rate is the national base rate.

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

This is a revision to an existing information collection (OMB Number 0584-0607; Expiration 4/30/2019), with 3,792 burden hours and 12,338 responses. With this submission, FNS estimates that 307 burden hours and 1 response will be added to the collection. The difference in burden is due to adjustments. In the previous submission, FNS only estimated burden for non-respondents in regards to the pre-test and the web survey. In this submission, FNS has also accounted for the non-respondents' time for the various survey communications, including recruitment by email and any follow-up phone calls. For the e-mail notification and FAQ (Appendix B6), FNS has adjusted the time for respondents to read these materials from three to 30 minutes. This email notifies which SFAs have been selected for the study and takes time to review. The original time included was not estimated to be accurate.

Additional changes include an increase in the number of CN Directors who pretested the materials (from 2 to 3 individuals), as well as an increase in the time it took to complete (from 1 hour to 3 hours). Furthermore, the survey has been edited and the time expected to complete the CN Director survey has been determined to be 2 hours going forward. FNS had underestimated the length of time it would take originally and has since adjusted those numbers. Lastly, the SFA Director pretest was adjusted to take 3 hours; in this case, there is a change in the non-respondent burden as well. It was not initially recognized as a task with burden but has since been re-estimated.

With these revisions, FNS estimates that this information collection will have 4,099 burden hours and 12,339 responses annually (for each SY 2016-2017, 2017-2018, 2018-2019).

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

The second year of data collection will begin following OMB approval and run for approximately 13 weeks (Table A.3). Data file preparations will follow immediately after that. The draft Year 2 report will be submitted to FNS approximately 28 weeks after OMB approval.



**Table A.3. Data Collection Schedule**

Activity	Due Date
Pretest of SFA and CN Director surveys	Sep 24–Oct 11, 2016
Data Collection (SFA Survey and CN Director Survey)	Starting 1 week post-OMB approval and lasting 13 weeks
Invitation letter to State CN Directors (Received)	1 week post-OMB approval
Confirmation Email to CN Directors to verify receipt of survey package	2 weeks post-OMB approval
Email reminder sent out to CN Directors	Starting 3 weeks post-OMB approval and lasting 4 weeks
Telephone calls to CN Directors to answer questions, remind them to complete the survey, and conduct survey	Starting 7 weeks post-OMB approval and lasting 2 weeks
Thank you letters mailed to CN Directors	10 weeks post-OMB approval
Invitation letter to SFA Directors (Received)	1 week post-OMB approval
Confirmation Email to SFA Directors to verify receipt of survey package	2 weeks post-OMB approval
Email reminder sent out to SFA Directors	Starting 3 weeks post-OMB approval and lasting 5 weeks
Telephone calls to SFA Directors to answer questions, remind them to complete the survey, and conduct survey	Starting 9 weeks post-OMB approval and lasting 3 weeks
Thank you letters mailed to SFA Directors	13 weeks post-OMB approval
Data file preparation	13 weeks post-OMB approval and lasting 9 weeks
Data Analysis and Reporting	22 weeks post-OMB approval and lasting 20 weeks

**a. Plans for Tabulation of the Survey Data**

The analysis of the Year 2 data will provide a “snapshot” of the CN programs’ characteristics and operations. Descriptive statistics including frequency distributions and cross-tabulations will be generated to address each research question; as appropriate for the research questions, analyses will be presented by school type, SFA size, poverty level, FNS Region, and other characteristics.

The data from the SFA Director Survey will be weighted to produce nationally representative estimates of the population of SFAs at the time of the data collection (SY 2016–17). Information from the FNS National Database and the National Center for Education Statistics’ CCD database will be used to adjust the weights to minimize nonresponse bias if necessary.

**b. Plans for Publication**

A final report will be produced by the contractor. The final report will be published and available in its entirety on the FNS website.

**A.17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Agency will 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."**

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