

**APPENDIX E5.
RESPONSE TO NATIONAL AGRICULTURAL STATISTICS SERVICE (NASS)**

Response to National Agricultural Statistics Service (NASS) Comments on Evaluation of the School Meal Data Collection Process

Overview

This appendix provides Westat's response to the comments received from the National Agricultural Statistics Service (NASS) on the Revised Draft OMB Package. The response to the comments is organized as follows: A) response to the general comments B) response to appendices comment; and C) responses to Part B comments.

Additional edits and suggestions from NASS within Part A and Part B were incorporated (as tracked changes).

Response to General Comments

NASS General Comments:

This docket is well described and documented. One item that seems to not be discussed much is what methodology will be used to summarize the data and create the recommended guidelines and pinpoint errors. The responses to the interview questions are mostly open-ended ones. Other than compiling the text responses, I would like to see discussion on how these responses will be quantified and summarized.

Response:

Additional information on the methodology used to summarize the data has been added to section B.2:

For the analysis, an iterative approach will be used, first analyzing the rich and detailed information we collect during on-site qualitative interviews. Analysis will include review of data elements with most frequent errors by each of the three forms and any variations among school and SFA size. We will also analyze methods of data collection and aggregation by form as well as school and SFA size in addition to most frequent method and modes of data transmission for each form. Most frequent sources of 30- and 90-day meal count volatility on the FNS-10 form as well as type and frequency of data quality control measures will be explored.

Response to Appendices Comment

NASS comment:

In Part A and Part B Table of Contents, Appendix E is noted with 4 items. These four items were not included in the Appendices folder that accompanied this package. If items are to be noted, then I recommend making sure they're included in the docket package.

Response:

Appendix E contains 5 items, all of which will be included in the docket package.

Response to Part B Comments

NASS comment:

B-1: The respondent universe is listed as the respondents in this study, which is problematic. The universe would be all schools in the U.S. that meet criteria of having a meal plan program. The sample for this survey would consist of 4 states and all parties noted in the section.

In constructing the sample, the sampling methodology is discussed generically, providing more detail behind the selection would be beneficial.

Response:

The respondent universe is listed as all schools in the U.S. participating in the National School Lunch Program. Detailed information on the selection criteria in the sample selection has been added to Part A.2, *Purpose and Use of the Information*.

Nass comment:

B-3: The text states an expected 190/197 ~ 96% response rate. The guideline is referenced that cooperation is mandatory, but an expectation of 96% is quite high. On top of the high response rate, nothing is of note on how non-response will be handled. It is stated that 7 respondents from the SFA Directors will be non-response, how is their non-response going to be adjusted?

Response:

Regarding the high response rate, participation is ultimately voluntary and we expect that support and agreement to participate at the State Director level will be communicated to the SFA Directors, which will then in turn communicate to School Food Managers.

Regarding non-response, we will effectively communicate and employ strategies of refusal-conversion to those respondents who initially decline participation. If the respondent refuses to participate, the next respondent fitting similar selection criteria will be invited to participate. A final count will be kept on the number of non-responders.