

Response to National Agricultural Statistics Service (NASS) Comments on APEC III OMB Package

H.1 Overview

This appendix provides Westat’s response to the comments received from the National Agricultural Statistics Service (NASS) after their review of the 2nd Revised Draft OMB Package. The response to the comments is organized as follows: A) responses to the overall comments, and B) responses to appendix comments.

Additional edits and suggestions from NASS within Part A and Part B were incorporated (as tracked changes). In addition, the revised OMB package was submitted to the Westat Editorial department for an independent editorial review, editing, and QC.

H.2 Response to Overall Comments

NASS Comment #1. Please explain how the total number of responses in Part A, Section 3 is calculated. I can’t tell if you should be including the cognitive interview responses or not.

Out of the 60,848 total responses for this collection, 9 percent (5,412) of responses will be submitted electronically. An additional 7,480 records from 1,331 requests will be electronically entered into the study database by data collectors from abstraction from existing hard-copy SFA and school records, and thus present minimal burden on respondents.

The 60,848 total responses are the sum of 55,220 responses from respondents plus 5,628 responses from non-respondents. This includes the program non participants from the cognitive testing.

The non-respondents are included because we presume they will spend some time reviewing the recruitment (for households) or request (for SFAs/schools) materials.

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The additional 7,480 records from 1,331 requests include requests from different staff at the SFA and school. These are not included in the estimated 9 percent of responses submitted electronically.

NASS Comment #2. I noticed references Provision 1, 2, and 3 schools starting with Appendix B documents, but these types of schools are not defined anywhere. Also there is no mention of these types of schools in your sampling process.

The SFA directors will be very familiar with provision schools. However, we have added the definition as a reference to Appendix B1, where it is applicable (also provided below). The sampling does not include special consideration for provision schools. If provision schools are sampled, we will follow special procedures (as described in data collection procedures) because of their different procedures for meal claims.

Special Assistance Alternatives

In an effort to reduce paperwork at the local level, Congress has incorporated into Section 11(a)(1) of the National School Lunch Act three alternative provisions to the normal requirements for annual determinations of eligibility for free and reduced price school meals and daily meal counts by type (free, reduced price and paid meals) at the point of service.

Provision 1

This Provision reduces application burdens by allowing free eligibility to be certified for a 2-year period. In schools where at least 80 percent of the children enrolled are eligible for free or reduced price meals, annual notification of program availability and certification of children eligible for free meals may be reduced to once every 2 consecutive school years. All other households must be provided a meal application and are allowed to apply for meal benefits each school year. There is no requirement to serve meals at no charge to all students. Schools must continue to record daily meal counts of the number of meals served to children by type as the basis for calculating reimbursement claims. Provision 1 has been an option for schools since publication of regulations in 1980.

Provision 2

This Provision reduces application burdens and simplifies meal counting and claiming procedures. It allows schools to establish claiming percentages and to serve all meals at no charge for a 4-year period. Schools must serve meals to all participating children at no charge for a period of 4 years. During the first year, or base year, the school makes eligibility determinations and takes meal counts by type. During the next 3 years, the school makes no new eligibility determinations and counts only the total number of reimbursable meals served each day. Reimbursement during these years is determined by applying the percentages of free, reduced price and paid meals served during the corresponding month of the base year to the total meal count for the claiming month. The base year is included as part of the 4 years. At the end of each 4-year period, the State agency may approve 4 year extensions if the income level of the school's population

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remains stable. Schools electing this alternative must pay the difference between Federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than Federal funds. Provision 2 has been an option for schools since publication of regulations in 1980.

Provision 3

This Provision reduces application burdens and meal counting and claiming procedures. It allows schools to simply receive the same level of Federal cash and commodity assistance each year, with some adjustments, for a 4-year period. Schools must serve meals to all participating children at no charge for a period of 4 years. These schools do not make additional eligibility determinations. Instead, they receive the level of Federal cash and commodity support paid to them for the last year in which they made eligibility determinations and meal counts by type, this is the base year. For each of the 4 years, the level of Federal cash and commodity support is adjusted to reflect changes in enrollment and inflation. The base year is not included as part of the 4 years. At the end of each 4-year period, the State agency may approve 4 year extensions if the income level of the school's population remains stable. Schools electing this alternative must pay the difference between Federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than Federal funds. Provision 3 has been an option for schools since 1995 through an implementing memorandum.

Source: <https://www.fns.usda.gov/school-meals/provisions-1-2-and-3>

NASS Comment #3. In Tables 3-1 and 4-1 in Appendix N, you reference FNS regions, but they are not defined anywhere in the docket. Please define these regions.

The revised OMB Package defines the seven FNS regions in a note at the beginning of Appendix P APEC III SFA Sample Selection Memo (formerly Appendix N). They are also defined below.

1. Mid-Atlantic Region (MARO)—Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Puerto Rico, Virgin Islands, Virginia, West Virginia
2. Midwest Region (MWRO)—Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin
3. Mountain Plains Region (MPRO)—Colorado, Iowa, Kansas, Missouri, Montana, Nebraska, North Dakota, South Dakota, Utah, Wyoming
4. Northeast Region (NERO)—Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont
5. Southeast Region (SERO)—Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee
6. Southwest Region (SWRO)—Arkansas, Louisiana, New Mexico, Oklahoma, Texas

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*NASS Comment #4. For those documents provided in English and Spanish,
I have only reviewed and made comments on the English versions.*

Westat applied requested revisions to both the English and Spanish versions as appropriate.

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H.3 Response to Appendix Comments

The NASS comments to appendices generally fell into one of four categories including: a) editorial typos, b) definition of terms, c) process clarification, and d) consolidation of appendices.

The editorial suggestions within the appendices were applied. In addition, the appendices were submitted to an independent review for final QC to ensure that no editorial typos remain within the package.

Westat defined specific terms as appropriate and revised or added text to clarify any data collection process. For example, within specific appendices, Westat revised the summary section and added text for clarification and/or instruction to the data collector.

Westat appreciated the recommendation from NASS to consolidate various appendices and did so accordingly. Appendices included within the Final OMB Package are clean versions with all NASS comments addressed throughout. Table H-1 (on the next page) outlines Westat responses to the comments that did not necessitate an actual change to the text within an appendix or those comments that required a more detailed response.

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Table H-1. Response to NASS Comments (no Appendix Change and/or Further Response Needed)

Old Appendix #/Title	NASS Comment	Response to Comment	New Appendix #/Title
B1. SFA Request Letter for Electronic Records (CEP and non-CEP)	Pg.1-What are provision schools?	<p>No Change Made; In an effort to reduce paperwork and other administrative burdens at the local level, Congress incorporated into Section 11(a) (1) of the Richard B. Russell National School Lunch Act (42 USC 1759a) three alternative Provisions to the traditional requirements for annual determinations of eligibility for free and reduced price school meals and daily meal counts by type. These alternatives are commonly referred to as Provision 1, Provision 2, and Provision 3. The Federal regulations for Provisions 1, 2, and 3 are found in 7 CFR 245, Determining Eligibility for Free and Reduced Price Meals and Free Milk In Schools.</p> <p>7 CFR 245: http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=7:4.1.1.1.9 or https://www.gpo.gov/fdsys/pkg/CFR-2016-title7-vol4/xml/CFR-2016-title7-vol4-part245.xml</p> <p><u>Provision 1</u> reduces application burdens by allowing schools where at least 80 percent of the children enrolled are eligible for free or reduced price meals to certify children eligible for free meals for a 2 year period. Schools continue to take daily meal counts of the number of meals served to children by type as the basis for calculating reimbursement claims.</p> <p><u>Provision 2</u> requires that the school serve meals to participating children at no charge but reduces application burdens to once every 4 years and simplifies meal counting and claiming procedures by allowing a school to receive meal reimbursement based on claiming percentages. Additional 4-year extensions to Provision 2 are possible when certain conditions are met.</p> <p><u>Provision 3</u> requires that the school serve meals to participating children at no charge but reduces application burdens and meal counting and claiming procedures by allowing a school to receive a comparable level of Federal cash and commodity assistance as the school received in the last year in which free and reduced price eligibility determinations were made, adjusted for enrollment, inflation and operating days if applicable, for a period up to 4 years. Additional 4-year extensions to Provision 3 are possible when certain conditions are met.</p> <p>Reference: https://www.fns.usda.gov/sites/default/files/prov2guidance.pdf</p>	<p>B1.SFA Request For E-Records (Non-CEP Schools For Household Sampling)</p> <p>OR</p> <p>B3. SFA Request for E-Records (CEP Schools For ISP Data Abstraction)</p>

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Old Appendix #/Title	NASS Comment	Response to Comment	New Appendix #/Title
B2. SFA Reminder Letter for Electronic Records (CEP and non-CEP)	Pg.1-On the website, the SFA is given the option to add a school. What is the purpose of this? Shouldn't all schools they have been sampled for already be on the site?	No Change Made; At the time of the NASS's review, the study was in the process of developing the sample frame. As such, schools had not yet been sampled. Westat obtained the list of schools from public records and sent it to the SFAs to review and update as needed. The option to add/remove a school on the website was made available to SFAs because in some cases, a school on the list had been closed, thus, the SFA deleted the school. In other cases, a school was missing from the list and so the SFA added the school.	B2. SFA Reminder For E-Records (Non-CEP Schools For Household Sampling) OR B4. SFA Reminder For E-Records (CEP Schools For ISP Data Abstraction)
B7. SFA Reimbursement Claim Verification Form—Sampled Schools	Reference Period, Pg. 2-What determines if the reference period is not a target month? Why would the target period be a week? Why would the target period be a day?	In most cases, the data collector will use the Target Month. However, in rare instances where the data for the Target Month is not available or can no longer be accessed, the data collector will collect data for the Target Week (the week prior to the data collection visit) or in even rare instances, the Target Day (the day of the visit). Text updated to clarify when data collectors will gather data for the Target Month, Target Week or Target Day.	B9. SFA Reimbursement Claim Verification Form—Sampled Schools
B8. SFA Reimbursement Consolidation and Claim Verification Form—All Schools	Reference Period Pg. 1-Is it possible to have different reference periods for each school? If so, how would you	Yes, the target month (or week or day) can and will often be different across schools. The requirement is that the meal count and claims are obtained for the same Target Month (or week or day) from the school and their SFA, and State. The data will be linked for each school, SFA, and State triad, and thus it is okay if it is different across schools. Text updated to clarify when data collectors will gather data for the Target Month, Target Week or Target Day.	B10. SFA Reimbursement Consolidation and Claim Verification Form—All Schools

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	handle that situation?		
B10. SFA Director Survey (web-based)	Question A11, Pg. 6- In the case where an SFA covers multiple districts, is it possible for some districts to receive the 6 cents while others don't?	No Change Made; The additional 6 cent reimbursement is based on ALL schools within an SFA meeting the standards. If an SFA operates the meal programs on behalf of multiple school districts, they would still only be 1 SFA (so all schools would have to meet standards for the SFA to be certified).	B11. SFA Director Survey (web-based)
B10. SFA Director Survey (web-based)	Question A12, Pg.6- Is it possible for some schools in the SFA to receive this while others don't?	No Change Made; The two-cent differential applies to the SFA as a whole. As a result, Westat has changed the beginning of A12 from "Schools where 60 percent..." to "SFAs" where 60 percent or more..." Section 4(b) (2) of the Richard B. Russell National School Lunch Act (42 USC 1753) provides further information on this topic.	B11. SFA Director Survey (web-based)
Old Appendix #/Title	NASS Comment	Response to Comment	New Appendix #/Title
C1. School Pre-Visit Interview	Pg. 3- Do you care about base/non-base year for P1 or P3 schools?	For Provision Schools we must determine if they are in a base year for 2017-2018 because the claiming percentages are set in the base year, and thus we must use data from the base year. Text updated to ask about base/non-base year for any provision (P1, P2 or P3) school.	N/A
C3. Meal Transaction Observation Form	Pg. 1 (offer versus serve) - Is this a program name? Just by looking at it, it seems like the answer options should be Offer and Serve instead of Yes and No.	No Change Made; Offer Versus Serve is the type of meal service provided to students (most often in high schools). Data Collectors will be trained on what types of meal service constitute Offer Versus Serve and will record Yes or No during the Meal Observation.	N/A
C3. Meal Transaction	Pg. 2- What are the required	No Change Made; Data Collectors will be trained on the required components. For the NSLP, all meals must contain: a fruit, a vegetable, a grain, a meat/meat	N/A

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Observation Form	components?	alternate and milk. For the SBP, all meals must contain: a fruit, a grain and milk. During the meal observation, data collectors will record Yes or No if all meal components were made available for Offer versus Serve (OVS). (Reference: https://www.fns.usda.gov/sites/default/files/dietaryspecs.pdf).	
C6. School Meal Count Verification Form	Pg. 1 (Reference Period) - Is each reference period completed for all schools? If not, how do you determine which reference period to use for each school? Do any schools complete two target periods and not the third?	In most cases, the data collector will use the Target Month. However, in rare instances where the data for the Target Month is not available or can no longer be accessed, the data collector will collect data for the Target Week (the week prior to the data collection visit) or in even rare instances, the Target Day (the day of the visit). Text updated to clarify when data collectors will gather data for the Target Month, Target Week or Target Day.	N/A
C6. School Meal Count Verification Form	Pg.6 (Enter 1 if reference period is Target Day) - Is D3 asking for the number of serving days during the reference period?	Yes, D3 is asking for the number of serving days in either the Target Month or Target Week. The instruction text has been revised to say, "Number of Serving Days in the Target Month or Target Week. For Target Day, enter 1."	N/A
Old Appendix #/Title	NASS Comment	Response to Comment	New Appendix #/Title
D5. Household Survey	Question B13, Pg. 7- Should there be a separate code	No Change Made; Question B4 and B5 ask if the student ate breakfast at school and if the meal was through the Breakfast Program.	N/A

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	indicating Target School did not offer breakfast?		
D5. Household Survey	Instruction to Interviewer, " REPEAT FOR EACH PERSON ON LIST, UNTIL INFORMATION IS COLLECTED FOR ALL LISTED PERSONS," Pg. 32- If the respondent doesn't know or refuses to answer income information for one or more adults in the household, how will this be recorded?	No Change Made; Item 2 in the General Notes section states: For each question, the "Don't Know", "Not Applicable", and "Refused" response options are not listed on the hardcopy version of the survey. Once the survey is finalized, the Computer Assisted Personal Interview (CAPI) program automatically provides these response options for each question.	N/A