

**SUPPORTING STATEMENT FOR**

“Child Nutrition Database”  
OMB No. 0584-0494

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**A. Justification**

**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.**

This is an extension of a currently approved collection. The Child Nutrition Database (CNDB) is a necessary component and is required to be part of the nutrient analysis software approved by the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) in implementation of the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Nutrition Standards in the National School Lunch and School Breakfast Programs final rule (RIN 0584-AD59) was published in the January 26, 2012 Federal Register, Vol 77, No. 17. This final rule sets forth the food-based meal patterns, including requirements for three dietary specifications (nutrient standards) in 7 CFR §210.10 for lunches and §220.8 for breakfasts. The regulations (7 CFR 210.18) also require State agencies (SAs) to conduct a nutrient analysis of school lunches and breakfasts as a part of the administrative review ( this burden is covered under OMB # 0584-0006 7 CFR Part 210, National School Lunch Program, expiration date 9/30/2019) to monitor compliance with the dietary specifications for calories, saturated fat, and sodium. State Agencies are required to use a USDA-approved nutrient analysis software program to determine compliance. The USDA-approved nutrient analysis software must include the CNDB to provide SAs with the nutrient data of foods typically used in school recipes and menus, as well as for food products that are marketed to schools by food manufacturers. The CNDB, incorporated into the approved nutrient analysis software, provides the SAs with the necessary nutrient information to assess compliance with the dietary specifications. This streamlines the process for obtaining and utilizing nutrient data for SAs and school program operators.

The CNDB contains nutrient composition data for: 1) food items from the USDA National Nutrient Database for Standard Reference (SR); 2) standardized recipes for Child Nutrition Programs developed by FNS; 3) brand name commercially processed foods, and 4) USDA Foods [commodities]. Therefore, FNS requires (7 CFR 210.10(i)(4)), that the CNDB be incorporated into all software approved by FNS for nutrient analyses in the school meal programs. As a part of the administrative review, when deemed necessary, the State agency staff uses approved software to conduct a weighted nutrient analysis of reimbursable meals. The ability of SAs to conduct this nutrient analysis of school meals is dependent upon availability of the CNDB to the software companies.

The CNDB is available free of charge and will be regularly maintained and updated to ensure that the information is accurate and current.

The Agricultural Research Service (ARS) and FNS originally cooperated in the development of the CNDB. Initially, ARS administered, updated, and maintained the CNDB ensuring data accuracy and validity. In recent years, an outside contractor, in collaboration with FNS, has collected the data and managed the database. Many of these foods are specifically formulated for the Child Nutrition Programs, including NSLP, SBP, Summer Food Service, and Child and Adult Care Food Programs, making them unique and different from other food products. Most manufacturers that voluntarily submit nutrient information for this collection also market their products to schools.

**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.**

The FNS-710 CN Database Qualification Report is used to collect nutrient data from food manufacturers for commercially processed foods that are sold and marketed for use in the Child Nutrition Programs. Nutrient data may be submitted for up to 18 nutrients for each food item. Data for three nutrients, calories, saturated fat, and sodium, are required for each food item that is included in the CNDB. Household serving size information with its corresponding gram weight is also collected to allow for conversion to nutrients per serving size of other weight, volume, and each-type measures from the “per 100 grams” base amount.

This collection is voluntary. Nutrient data is collected from food manufacturers for the products they market and sell to schools participating in the Child Nutrition Programs.

The data is collected from food manufacturers using the FNS-710 CN Database Qualification Report which is available in paper, spreadsheet, and online formats. The traditional paper format is the original format of the FNS-710. The online Web Tool format was developed several years ago to facilitate ease of entry for both the food manufacturer entering data and the contractor compiling the CN Database. Since the previous collection approval, the spreadsheet format was developed to facilitate bulk submissions of data in response to requests from the food industry to be provided with a more streamlined format for submission of nutrient data for large numbers of food products at one time.

The frequency of response for new and updated data is addressed annually. If a company has additions or changes to product information in the CNDB, the manufacturer is encouraged to submit the new or revised information for the next update of the database. Throughout the year FNS markets to food manufacturers the submission of data using the FNS-710 for inclusion in the CNDB, however, since the CNDB is usually

updated once per year, manufacturers are encouraged to finalize any updates, additions, or deletions in the months immediately preceding the compilation of the annual update.

The information gathered for this collection, using the FNS-710 CN Database Qualification Report, is required to be used by private software companies in their nutrient analysis software programs approved by FNS for use in nutrient analyses required in the school meal programs. Both the State agencies and program operators use this nutrient information in the approved software programs for auditing and nutrient analysis review purposes. The regulations require that SAs conduct nutrient analyses of school lunches and breakfasts as a part of the administrative review (every 3 years) to determine they are meeting specific nutrient requirements.

USDA-approved nutrient analysis software generates a report that compares a menu's nutrient analysis against the required dietary specifications (nutrient standards) of the school meal programs. This allows a menu planner to modify the menu until the required dietary specifications (nutrient standards) are met as well as helps to ensure compliance with these specific nutrient requirements. During the administrative review, SAs use the program operator's nutrient analysis reports from USDA-approved nutrient analysis software or conduct their own nutrient analyses of a school's menus that have been offered for compliance with the nutrient standards.

Since the previous submission, the paper form, spreadsheet, and online Web Tool were revised to add two nutrients, vitamin D and potassium, and to remove the previous requirement to provide the product ingredient list. All formats were also edited to update terminology and instructions.

The data collected is not shared with any other organization or agency other than through the CN Database. Anyone with a level 2 eAuth account may view the information in the Web Tool version, but the paper copies and spreadsheets are not shared or distributed, nor is the data exported from the Web Tool. The sole purpose of the data collection is to contribute to the CN Database.

**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.**

According to the E-Government (E-Gov) Act of 2002, Federal agencies are required to provide electronic submission as an alternative to paper submission where feasible. FNS makes every effort to comply with these requirements and, to improve efficiency and data quality, has acquired a contractor to maintain an online electronic version of form FNS-710, called the online Web Tool, for this information collection. A previous contractor created the online Web Tool at <https://healthymeals.fns.usda.gov/online-web-tool-submitting-nutrient-data-0> to reduce time in submitting data for the CNDB. This system stores the information required in the CNDB. Since FY 2013, 100% of the submissions were collected on the Excel spreadsheet format submitted via e-mail or in the online Web Tool. The paper form is being maintained as a back-up and support document. It is provided on the home page of the online Web Tool. The contractor has a system of transferring the requested information from the FNS-710 (Web Tool, spreadsheet, or paper copy) to the CNDB with no additional input from the manufacturers. FNS estimates that 24% (approximately 269) of the responses are collected electronically.



**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.**

Similar nutrient databases exist; however, those do not meet the FNS programs' specific needs for menu and recipe analysis of meals served by schools. Many of these foods listed in the CNDB and served in the school meals are specifically formulated for the Child Nutrition Programs, including NSLP, SBP, Summer Food Service, and Child and Adult Care Food Programs, making them unique and different from other food products. Manufacturers do not necessarily submit these products for the school market to the other similar databases.

When nutrient data for products marketed to schools or other Child Nutrition Programs is included in the CNDB, which is then incorporated into the approved nutrient analysis software, the data for these products are available to program operators to use in their recipe development and menu planning. When nutrient data for the products they buy and use on their menus is included in the CNDB, it saves the SFAs and State agency staff time that would be spent to retrieve and enter this data into the approved software themselves. The CNDB also improves accuracy of nutrient data utilized in Child Nutrition Programs due to the fact that these values are not being entered by hand.

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

Currently about half (approximately 50%) of the food manufacturers submitting data using the FNS-710 for the CNDB are small businesses. Submitting data to the CNDB using the FNS-710 reduces the burden to small businesses because they do not have to supply their product nutrient information to every school participating in the Child Nutrition Programs. Nutrient information that is required for submission by a

manufacturer has also been held to the minimum (3 nutrients) and small businesses can submit their information using the FNS-710 to one central facility (the FNS CNDB contractor) who will make this information available to all Child Nutrition Programs through the CNDB.

**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.**

Food manufacturers are encouraged to update the information for their products annually because the CNDB is usually updated annually. SAs and program operators use information from the CNDB, through a USDA-approved nutrient analysis software program, to comply with the dietary specifications provided in 7 CFR 210.10 and 210.18. If the information is not collected and updated regularly for the CNDB, the nutrient data will become out of date and less useful to program operators, causing them to rely on their individual vendors for current nutrient data. By analyzing recipes and menus with a software program that includes the CNDB, program operators can ensure that their menus meet the nutrient standards in 7 CFR 210.10 and 210.18. These nutrient analyses will be most accurate when manufacturers update nutrient data for their products frequently for the CNDB.

**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 that would cause this information collection to be conducted in a manner inconsistent with 5CFR 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, 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.**

A 60 day notice was published in the Federal Register on Wednesday, April 12, 2017 (Volume 82, Number 69, and Page 17626). The public comment period ended on June 12, 2017. Two public comments (Appendix D and E) were received in response to the notice published in the Federal Register.

The first comment was directed towards the CN Labeling Program and not the CNDB. The commenter asked FNS to explore ways to increase the number of manufacturers who obtain CN Labeling. A copy of the response letter is found in Appendix F.

The second comment was from an anonymous commenter whose comments were in support of the CNDB. The commenter identified himself as a pediatrician, stating that he believes that providing more nutrient information will help empower families to make decisions. A response was not provided because the commenter did not provide any contact information and the comments were in support of the CNDB with no suggestions, criticisms, or questions.

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

In April 2017, a software developer with a USDA-approved nutrient analysis software program that includes the CNDB provided feedback to the FNS database contractor regarding the collection of data for the CNDB. The developer asked that FNS provide detailed guidance to the food manufacturers, so the data submitted is complete, especially the product code or UPC, so school users can ensure they are using information for the correct product. The developer also asked FNS to be sure to obtain the household serving size information for foods included in the CNDB because this is needed by the school users. If a user does not have the serving size information for a manufacturer's food product, the program operator will have to enter it themselves. She suggested obtaining data from existing data sources for food

manufacturers' data because the product code or UPC is included. FNS is currently exploring ways to incorporate food manufacturer data from other sources. FNS also did more follow up with manufacturers this year to obtain correct household serving size information. In the past incorrect information was simply omitted. The contact information for this software developer is:

Meg Chesley  
Water Walkers, Inc. DBA Health-e Pro  
P.O. Box 124  
Anacortes, WA 98221  
Phone:(800)838-4856 x5  
Fax: (877)355-6405  
E-mail: [info@healthepro.com](mailto:info@healthepro.com) (link sends e-mail)  
Web site: [www.healthepro.com](http://www.healthepro.com)

In summer of 2016, FNS staff asked six of the software developers who use the CNDB in their nutrient analysis software for feedback on the CNDB process. Several developers asked for improvements to the formatting and presentation of the weights and measure data. Comments included standardizing the format of the measure descriptions and having separate unique identifiers for the weights and measure information. FNS is working toward making the standard measures more uniform, while taking into consideration the many different measures used by food manufacturers for their products and the program operator's need for precise measure information for the nutrient analyses of menus. The unique identifier for weights and measure data is an idea that FNS would like to implement because it will likely improve the process of updating the database for the software developers, however contractual issues over the past two years prevented FNS from being able to implement the unique identifier. The following software developers who provided feedback about the weights and measure information of food products included in the CN Database:

Marcus Yabuta

Harris School Solutions

2540 Warren Drive; STE A

Rocklin, CA 95677

916-577-2900

[myabuta@harriscomputer.com](mailto:myabuta@harriscomputer.com)

Kristen Vickers

Heartland School Solutions

787 Elmgrove Rd., Bldg. 1

Rochester, NY 14624

(800) 724-9853

[Kristen.vickers@e-hps.com](mailto:Kristen.vickers@e-hps.com)

Bruce Adkins

Cybersoft Technologies, Inc.

4422 FM 1960 West, Suite 300

Houston, Texas 77068

(866) 510-2525

[Bruce.adkins@primeroedge.com](mailto:Bruce.adkins@primeroedge.com)

The spreadsheet version of the FNS-710 was added as an option for data submission after several food manufacturers expressed the need for a more convenient way to submit data for a large number of products, rather than entering data for one product at a time in the online Web Tool. This year, for the CNDB, Release 21 (CN21), thirteen food vendors submitted product nutrient data in bulk using the spreadsheet.

Some food vendors have expressed an interest in providing the data more frequently or providing data from other sources, such as GS1, an international association working toward the implementation of global product standards.

Software developers have also provided input on the frequency of data collection and format of the data. FNS continues to be receptive to suggestions and research the options available to assist food manufacturers in this process.

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

There is no payment or gift 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 will comply with the Privacy Act of 1974. No confidential information is associated with this collection of information, nor does the collection request any Personal Identifiable Information (PII); therefore, this information collection does not require a System of Records Notice (SORN) under the Privacy Act.

The USDA has published a SORN, titled USDA.OCIO-2 eAuthentication Service, which covers the eAuthentication that provides the overall security for accessing FNS systems. The SORN was published in the Federal Register on March 14, 2012 (Vol. 77, pp 15024-15026). Manufacturers are required to utilize

eAuth level 2 to access the online Web Tool; however, the information used for level 2 access is not accessed by individuals managing the CNDB. In the future to improve security of the online Web Tool version, manufacturers may need to complete the FNS-674 to designate specific persons that may submit and access their company's information.

**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.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

This is an extension of the currently approved collection. FNS estimates that the burden will remain unchanged for this submission at 32 respondents, 1,120 responses, and 2,240 burden hours. Form number FNS-710 is used to collect information annually from food manufacturers, who produce foods for school food service markets, on a voluntary basis. The estimated average burden hours per food manufacturer may vary depending on the method of submission and the status of the required information up to a maximum of two hours. FNS accepts submissions via three methods: paper form FNS-710, the Excel spreadsheet, or the



online Web Tool version. Since this nutrient information has been required to be included on retail product labels since July 1994, the nutritional information required for the CNDB should be readily available for all products at no additional cost to the manufacturer.

Based on internal testing of FNS-710, and conversations with the contractor, the average time needed to provide the requested information on form FNS-710 is estimated to be not more than two hours per response for any of the three available formats of the FNS-710. Since the previous submission, the paper form, Excel spreadsheet, and online Web Tool were revised to add two nutrients, vitamin D and potassium, and to remove the obsolete ingredient list. The form was also edited to update terminology and instructions. The new spreadsheet version was developed to facilitate submission of bulk data. FNS does not expect the burden to be affected by these changes. In addition, data entry for some nutrients is optional. The CNDB includes 18 nutrients, but only three (calories, saturated fat, and sodium) are required to be included in the FNS-710 data submission.

Affected public is (Business-for-profit), respondent type Manufacturers; FNS estimated the number of respondents is 32 manufacturers, the annual frequency of response per respondent ( 1) (with up to 35 food items per manufacturer (32 X 1 X 35)) for a total of 1,120 responses x 2 hours per respondent = 2,240 burden hours.

Affected Public	Estimated # Respondents	# Responses (food items) Per Respondent	Total Annual Responses	Estimated Hours Per Response	Estimated Total Annual Burden
Manufacturers	32	35	1,120	2.0	2,240

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

Based on prior submissions, the respondents who report the required information are typically from a variety of occupations, including data entry specialists, dietitians or nutritionists, and sales/marketing managers. The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Occupational and Wage Statistics ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)). The total cost estimate was updated this year to use more representative occupations because it was determined that the occupation used in the previous submission, State agency and local education agency staff, was not the correct type of occupation. The mean hourly wage was calculated using an average of the hourly wage rates for the three types of occupations discussed above:

Data Entry Keyers; Occupational Code 43-9021 = \$15.21per hour

Dietitians and Nutritionists; Occupational Code 29-1031 = \$28.69 per hour

Marketing and Sales Managers; Occupational Code 11-2020 = \$66.52 per hour.

The average hourly wage of these three representative occupations is \$36.81.

TOTAL COST TO PUBLIC = 2,240 hours total burden X \$36.81/hour = \$82,454

- 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 data collection for respondents.

**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 annual cost to the government for this collection is \$254,789. The Federal government is contracting out the collection of information for and the maintenance of the CNDB. The annual cost of this contract is estimated to be \$200,000.00. The breakdown of the cost is as follows:

**3.11 CLIN Pricing –OPTION PERIOD III**

CLIN/SUB-CLIN	CLIN/SUB-CLIN DESCRIPTION	CLIN/SUB-CLIN AMOUNT
001	Maintenance & Support	\$178,804.80
002	Conference Support	\$14,680.63
003	Informational Material Support	\$6,204.34
<b>Total</b>		<b>\$199,689.77</b>

This information collection also assumes that a total of 320 hours of Federal employee time per employee for three employees (for a total of 960 hours) for a GS-13, step 5 nutritionist at \$51.48 per hour for a total of \$49,421 on an annual basis. It also assumes 100 hours of Branch Chief oversight for a GS-14, step 1 at \$53.68 per hour for a total of \$5,368. The three GS-13 employees work with the database contractor to provide oversight and coordination of the data collection process and compilation of the CNDB. The FNS staff review data collected, assist with answering questions from food manufacturers and software developers, assist the contractor with the process of data collection and compilation of the CNDB, attend biweekly meetings with the contractor, review and provide feedback on the annual CNDB release, test changes to the user-interface of the Web Tool, update the FNS-710 and coordinate approval of the ICR

process. The Branch Chief attends meetings with the contractor, FNS staff, and contract staff to ensure the work is done according to the PWS of the contract. The Branch chief also reviews meeting minutes, correspondence, and reports related to the FNS-710 ICR and the compilation of the CNDB. Federal employee pay rates are based on the 2017 General Schedule of the Office of Personnel Management (OPM) for the Washington-Baltimore-Arlington, DC-MD\_VA-WV-PA area.

The cost to the federal government has increased since the previous renewal. Staff hours increased to 320 hours per employee for three employees and 175 Branch Chief hours in FY17 due to contractor staff changes and other unforeseen challenges that were outside of the control of the Federal government. For this renewal, the total cost of FNS employees is \$54,789, which is an increase of \$47,053 from the previously estimated costs of \$7,736. The costs associated with the contract also increased from \$50,000 to \$200,000.

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

This is an extension without change for a currently approved information collection. There have been no changes to the information collection burden since the last renewal.

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

The data collected are expected to be released annually as part of the CNDB in Microsoft Access format on the Healthy Meals Resource System website <https://healthymeals.fns.usda.gov/menu-planning/software-approved-usda-administrative-reviews/child-nutrition-database>. The database is then downloaded by

software vendors who use it as part of their USDA-approved nutrient analysis software to be used in the weekly planning and assessment of Child Nutrition Program meals by State Agencies and NSLP and SBP participants (schools). Currently, the CNDB is expected to be updated and published annually until such time as it no longer serves a purpose for the Child Nutrition Programs.

**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 “Certification for Paperwork Reduction Act.”**

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-1.