

**FNS GENERIC CLEARANCE FOR SPECIAL
NUTRITION PROGRAMS QUICK RESPONSE SURVEYS**

OMB# 0584-0613

REQUEST FOR OMB CLEARANCE

Supporting Statement Part A

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A. JUSTIFICATION

1. Necessity of Information Collection

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 a request for a new generic clearance for the Food and Nutrition Service (FNS) that will allow FNS to quickly collect and analyze specific information from State and local administrators of the Special Nutrition Programs (SNPs), including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), National School Lunch Program (NSLP), School Breakfast Program (SBP), Fresh Fruit and Vegetable Program (FFVP), Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), Food Distribution on Indian Reservation (FDPIR), Commodity Supplemental Food Program (CSFP), and the Emergency Food Assistance Program (TEFAP). Currently, FNS conducts lengthy, large, and complex studies on broad topics about each SNP. These studies often take several years to complete. The Quick Response Survey (QRS) will provide a new mechanism for succinct quick-turnaround studies to complement the larger SNP studies and to answer policy and implementation questions that result from the larger studies. The SNP QRS, therefore, enables FNS to administer the SNPs more effectively by providing a mechanism for rapidly collecting current information on a specific time-sensitive feature or issue.

The two data collections planned under this generic ICR include: 1) an annual sample frame data collection, and 2) quick-response surveys. The annual sample frame data collection is a key first step and involves identifying the universe of entities from which to sample any quick-response

survey. For any forthcoming quick-response survey to occur within an abbreviated timeframe, the sample frame for the relevant program should already be identified. To do this, FNS will request contact information from the States for the local agencies within their purview. The quick-response survey data collections will utilize the sample frame information to contact respondents and allow FNS's SNPs to conduct shorter, quick-turnaround studies on program and policy-relevant topics. The information generated from these surveys will allow FNS to make more timely decisions about program operations, and supplements the information gathered on FNS forms and from longer-term (i.e., 5 years) FNS studies.

This request for clearance provides a brief description of each program that we anticipate will be using the generic QRS clearance. FNS will identify the relevant authorizing statutes for data collections submitted under this generic clearance with each generic IC submission to Office of Management and Budget (OMB). In most cases, the following authorizing statutes apply (Appendix A):

- The Richard B. Russell National School Lunch Act (as amended through Public Law 113–79, enacted February 07, 2014, Sec. 28) mandates programs under its authorization to cooperate with U.S. Department of Agriculture (USDA) program research and evaluation activities.
- Section 17 [7 U.S.C. 2026] (a)(1) of the Food and Nutrition Act of 2008 provides general legislative authority for the planned data collection.

FNS will use the QRS sample frame mechanism to collect contact and respondent characteristic information from State SNP administrators for local agency (LA) key contacts. State agencies (SAs) will be asked to report contact information for the local entities within their purview.

States should have this information readily available, which should ease their reporting burden. The number of entities about which States will be asked to provide contact information will depend on the number of local entities administering each program. State agencies will be contacted via email.

The Quick Response Surveys (QRS) will be narrow in scope, take approximately 20 minutes, and will be administered over the web with multi-mode (phone and email) follow-up to enhance response rates. Examples of research questions that FNS may seek to answer with QRS include:

- What percentage of Summer Food Service Program sites are open enrollment compared to closed enrollment sites?
- Which School Food Authorities are in rural compared to urban areas?
- How many State Child Nutrition Directors have school district level direct certification data?
- How many schools operating the NSLP have implemented Smarter Lunchroom techniques?
- How many WIC State Agencies approved foods with functional ingredients for purchase with WIC vouchers?
- Which Agency – WIC or Medicaid – pays for prescription infant formula in each State?

Program Background

- WIC provides Federal grants to State agencies for supplemental foods, health care referrals, and nutrition education for low-income pregnant, breastfeeding, and non-

breastfeeding postpartum women, and to infants and children up to age five who are found to be at a nutritional risk.

- NSLP is a federally assisted meal program operating in over 100,000 public and non-profit private schools and residential childcare institutions. School districts that participate in NSLP receive cash subsidies and donated commodities from USDA for each meal they serve.
- SBP is also a federally assisted meal program operating in over 89,000 public and nonprofit private schools and residential childcare institutions.
- FFVP provides free fresh fruits and vegetables to students in participating elementary schools during the school day. The fresh fruits and vegetables are provided separately from the lunch or breakfast meal, in one or more areas of the school.
- SFSP provides meals to all children under 19 years of age at approved SFSP sites in areas with significant concentrations of low-income children.
- CACFP subsidizes nutritious meals and snacks served to children and adults in participating day care facilities. Meals are provided to children in emergency shelters and eligible after school programs.
- CSFP provides nutritious USDA commodity foods and administrative funds to supplement the diets of income eligible seniors at least 60 years of age by supplementing their diets with nutritious USDA Foods.
- FDPIR provides USDA Foods to income eligible households living on Indian reservations and to Native American families residing in designated areas near reservations.

- TEFAP provides USDA Foods and administrative funds to States, which then provide food to local agencies that the States have selected, usually food banks, which then distribute the food to soup kitchens and food pantries that directly serve the public.

FNS will determine annually whether each SNP will conduct a QRS for their program and then FNS will direct its contractor, 2M Research Services, LLC (hereafter referred to as 2M), to construct a sample frame for all the relevant program administrators expected to receive a QRS that same year. Having these sample frames compiled and/or refreshed annually will enable each SNP QRS to be conducted more efficiently and minimize the potential for duplicate requests to be made of SNP program administrators from separate studies. The number of State agencies that will be asked to provide sample frame information will range from 51 to 90, depending on the program. FNS expects that collection of respondent local agency contact information from State agencies for these sample frames will always be a census.

The QRS mechanism will be used to survey key administrators of the SNP at the State, local, and site level. In most cases, FNS expects that any surveys of State Agencies will be a census, while surveys of local agencies (LAs) and sites will be nationally-representative samples constructed from contact lists provided by SAs to FNS for the sample frames. Sample sizes will range from less than 50 to approximately 2,500 for each QRS, depending on the specific program and research questions. QRS sampling approaches are discussed in more detail in Part B.

Procedures for Clearance

On an annual basis, sample frames will only be built for SNPs that indicate they would like to conduct a QRS in the same year. This ensures that respondents will only incur burden to build the sample frames when a QRS project will occur within the year and that respondents are not burdened to provide information that is not used. Each spring (March-April timeframe) FNS will provide OMB with an annual memo describing the sample frames that will be developed in that year based on the anticipated research needs for each SNP.

Before data collection activities are undertaken for each QRS, FNS will provide OMB with a memo describing the study, sample design, data collection activities, burden estimates, and a copy of survey instruments. Some survey items will be taken from existing survey instruments, while others may be new and developed specifically for the particular study. If the instruments contain new items, then the new items will be pretested and the findings from the pretests will be included in the memo.

2. Purpose and Use of the Information

Indicate how, by whom, 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 QRSs will collect information from SNP entities to provide FNS and other government officials with quick turnaround responses. These are voluntary surveys. Additional details are provided below.

Types of Information. The type of information that will be collected for the annual sample frames includes local agency director name, title, telephone number, email address, and mailing

address. The type of information that will be collected on each quick-response survey will vary depending on the scope of each QRS and the program being considered. Examples of research questions FNS may seek to answer with a QRS are provided in Question 1.

Information Collection Method. Information will be collected for the sample frames using the web (i.e., email exchange). Information will be collected for the quick-response surveys using the web (i.e., online surveys). Multi-mode follow-up using phone and email may also be used to enhance response rates of the quick-response surveys. We do not expect to change the data collection methodology over time for either type of data collection task.

Contacts for Information Collection. Local agency director name, title, telephone number, email address, and mailing address will be collected from State Agencies for the sample frames data collection. The local agencies about whom contact information will be requested include:(a) School Food Authorities (SFAs) and their participation in the NSLP, SBP, and FFVP, (b) Local WIC Agencies and, if readily available from the SAs, local WIC sites, (c) LAs involved in the CACFP, including Child Care Center (CCC) Sponsors, Independent CCCs, Family Day Care Homes (FDCH) Sponsors, Head Start Center Sponsors, and Adult Day Care Centers (ADCCs), (d) LAs that distribute food under CSFP, (e) Indian Tribal Organizations (ITOs) that distribute foods through FDPIR, (f) Sponsors and, if readily available from the SAs, the Sites that provide meals through SFSP, and (g) Eligible Recipient Agencies (ERAs), and, if readily available from the SAs, all Emergency Feeding Organizations (EFOs) in TEFAP.

Purpose of the Information Collection. The information collected from the annual sample frame and quick-response survey data collections will be used to produce summary reports, which answer the research questions posed by FNS for a specific quick-response survey.

Frequency of Information Collection. FNS will assemble sample frames annually for those Programs and respondent groups that have a quick response survey forthcoming. To this end, State agencies will not be contacted to provide information for a sample frame that FNS does not anticipate will be used during that year. Up to 12 QRSs are expected each year and the same Program respondent groups will not be recruited for participation more than once annually. The exact number during any given year will depend on the demand from FNS for obtaining quick-turnaround results for a SNP.

Information Sharing. All results will be presented in aggregated form in final reports made available in the research section of the USDA Food and Nutrition Service web site <http://www.fns.usda.gov/ops/research-and-analysis>.

3. Use of Information Technology

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, 2002 to promote the use of technology. The SNP QRS sample frame information collection will use a web-based, electronic approach where spreadsheets containing LA contact information will be requested and sent via

email. When necessary to encourage a response, telephone and email follow-up will be used to generate reminders to provide the requested electronic database(s). While information will be requested from and sent by SNPs electronically, none of the responses to the sample frame request will be entered into an online database and therefore, FNS estimates that none of the responses (0%, n = 2,499 responses) for the sample frame submissions will be collected electronically. This response estimate includes the SA contacts request and two reminders to submit the sample frame information, as shown in Appendix C.

SNP QRS uses a web-based data collection approach with telephone and email follow-up as reminders to complete the survey. Respondents are able to complete surveys over the phone if that is preferable. Telephone, email, and on-line support is available while taking a survey. Selected participants are notified in advance of the survey through communication channels established by FNS. With notification, the selected participants are provided a list of the specific information that will need to be included on their survey. All of these procedures are designed to minimize the burden on respondents. At this time, FNS estimates that 43% of the QRS survey responses (n=107,693 responses) will be collected electronically either via a web survey or with computer aided telephone interviews (CATI). This estimate includes the SA and LA QRS survey responses and excludes survey reminders, as shown in Appendix C.

In total, when combining the electronic submissions for the sample frame and QRS survey, FNS estimates that 43% (n=107,693) of all responses will be collected electronically.

4. Efforts to Identify Duplication

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 will be made to avoid duplication. The annual sample frames data collection will reduce burden to States for similar requests. As sample frame information is compiled annually, FNS will make it available for other data collection efforts, which will prevent FNS from requesting similar information repeatedly from States during the same year. Individual quick-response surveys will be motivated by the lack of information to address the specific research question(s). FNS routinely reviews information available from private sources such as the School Nutrition Association and the Center on Budget and Policy Priorities to avoid duplication of information requests.

5. Impacts Small Businesses or Other Small Entities

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

Neither of these data collections will impact any small businesses. The administrators and service providers are all either public or non-profit organizations and the impact on small entities will depend on the specific target of a QRS. For example, a QRS of Child Nutrition State Agencies will not have any impact, while all respondents to a QRS of Local WIC Sites would likely be small entities. Using the upper bound number of respondents presented in Appendix C, we estimate that approximately 65 percent of respondents will be small entities (approximately 70,031 entities over the three year approval period based on the generic scenario presented in Question 1). The burden is minimized for all respondents by keeping the questionnaires short,

providing advance notification of the survey, employing a user-friendly web interface for the survey, giving respondents the option to complete surveys over the phone, and providing technical support. Additionally, smaller local organizations will typically be sampled at a lower rate than larger organizations, reducing the overall burden on small organizations.

6. Consequences of Less Frequent Collection

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 data collection is essential to fill the information gaps remaining from the traditional long term studies that FNS conducts on the SNPs. Thus, this data collection is essential to FNS to administer the SNPs. The nutritional well-being of our nation's youth and vulnerable populations is an important policy issue. Yearly collection of contact information is necessary to keep the sample frames current. Each particular QRS will be motivated by a time-critical information gap that must be filled in order to adequately monitor program funding, statutory and regulatory compliance, and the adoption of program changes.

7. Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5

8. Federal Register Comments and Consultations Outside the Agency

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.

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.

A 60-day Federal Register Notice was published in the Federal Register on November 20, 2015, vol. 80, No. 224, page 72681-3. The comment period ended on January 19, 2016. One comment was received but it was not relevant to the study so FNS did not respond to it. (Appendix B)

Please note that in the 60-Day Federal Register Notice published on November 20, 2015, the estimated burden for this collection was calculated on an annual basis and not for the three-year approval period. The 30-Day Notice reports the three-year calculations (including adjustments to the annual estimates for the number of respondents and the total burden hours).

Consultations outside the agency

In addition to soliciting comments from the public, FNS consulted with Jeff Bailey from the 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.

9. Payment or Gift to Respondents

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

The participants in the study will not receive an incentive payment.

10. Assurance of Confidentiality

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

All personal contact information gathered from SNP State administrators pertaining to local-level SNP officials is for research purposes only and will be kept private to the full extent allowed by law. State administrators providing this information will be assured that respondent contact information (name, phone number, and email) will remain private and will only be used for the purposes of contacting local SNP staff to participate in a QRS or other FNS study.

All personal information gathered from State and local administrators participating in a QRS study will be for research purposes only and kept private to the full extent allowed by law.

Responses will be grouped with those of other study participants, and no individual administrators will be identified in any study report. Being part of a QRS study will not affect

any USDA benefits received by the programs participating in this data collection. Respondents will be assured that their private information (name, phone number, email) will remain private when invited to participate in a QRS. The contractor will create a unique ID for each participant and transfer the survey data back to FNS linked only to the unique ID. A separate file will be transferred that links the unique ID to the respondents' 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. FNS and the contractors will comply with the requirements of the Privacy Act of 1974.

11. Justification for Sensitive Questions

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

This study does not contain questions of a sensitive nature.

12. Estimate of Hour Burden Including Annualized Hourly Costs

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

- **Indicate the number of respondents, frequency of response, average time to respond, annual hour burden, forms number if applicable 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.**

This clearance package represents an umbrella clearance for approximately 12 separate surveys per year to be conducted over a three-year period. To create the sampling frames for the surveys, each SA will be asked to provide contact lists for the local agencies for their respective SNPs. Therefore, this ICR includes these SA requests. Although each quick-response survey conducted under this clearance will be short, the exact number of questions will generally vary; hence, the burden estimates for each survey will vary. Additionally, FNS does not know which populations or programs will be surveyed in any particular year. As a way of bounding the annual estimates, we estimated an upper bound estimate of the burden based on the burdens for the individual studies summarized in Appendix C. Appendix C and the summary show the respondent, response, and burden hour estimates for the three-year approval period.

In summary:

Estimated Number of Annual Respondents: 107,740

Estimated Number of Annual Responses per Respondent: 2.327

Estimated Number of Annual Responses: 250,745

Estimated Time per Response: 0.138 hours

Estimated Total Annual Burden on Respondents: 34,523 hours

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

Exhibit A.1 provides estimates of the annual costs for the scenario presented in Appendix C. The estimate of respondent cost for this illustration 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, NAICS Code 999001, and Occupational Group 11-9051 for LA directors and Occupational Group 11-9000 for SA directors. The hourly mean wage for 11-9051 (Food Service Managers) is \$29.59 per staff hour, and the hourly mean wage for 11-9000 (Other Management Positions) is \$47.49 per staff hour. Annualized costs for each QRS will be submitted with each request. Exhibit A.1 shows the three-year burden and respondent cost estimates.

Exhibit A.1. Annualized Cost to Respondents

Type of Respondent	Type of Instrument	Total Annual Burden	Hourly Wage	Respondent Cost
State Agency	Contact Request/QRS	2,033.44	\$47.49	\$96,568.06
Local Agency	QRS	32,489.26	\$29.59	\$961,357.20
Total		34,523		\$1,057,925.36*

*Total does not add up due to rounding

13. Estimates of Other Cost Burden

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.

No capital, start-up, or ongoing operation or maintenance costs are associated with this data collection.

14. Annualized Cost to Federal Government

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The cost to the Federal Government will depend on the number of hours Federal employees work on each survey, the number of surveys, and the associated contractor costs. However, we estimate that Federal employees will spend approximately 500 hours per year overseeing the surveys. Using the hourly wage rate of \$44.57 for a GS-12, step 6 federal employee from the 2017 Washington, DC locality pay table, FNS estimates that it will cost approximately \$66,855 over the three-year approval.

15. Explanation for Program Changes or Adjustments

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

This information collection was previously approved on September 12, 2016 with an estimated 34,518 burden hours and 250,736 responses. With this revision, FNS realized that the number of respondents for the TEFAP and CFSP state agencies needed to be adjusted. This adjustment has increased the burden by five hours and nine responses due to an administrative adjustment. FNS now estimates that this information collection will have 34,523 burden hours and 250,745 responses.

16. Plans for Tabulation and Publication and Project Time Schedule

For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

All contact information collected will be compiled in aggregated form in electronic databases.

This information may be shared with relevant FNS employees and contractors who are involved

in other studies involving the same SNPs and/or respondents in order to reduce the burden of duplicate information collections. This information will not be shared with the general public.

Data file preparations and analysis of the individual QRS would begin immediately after the data collection period. Because the QRS would be tailored to the specific needs of FNS, the data tabulations and analysis would be generated accordingly to best reflect the goals of the particular QRS. Typically, data files, tables, and a short summary will be produced. FNS programs may decide to share the results with program operators and/or publish findings on their website for the larger public.

17. Request to Not Display Expiration Date

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. Exceptions to the Certification

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act” of OMB Form 83-I. Part V “Certification Requirement for Paperwork Reduction Act.” If Agency is not requesting an exception, the standard statement should be used.

The agency is able to certify compliance with all provisions under Item 18 of OMB Form 83-I.

This study does not require any exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).