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United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

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TO: Steph Tatham, OMB Desk Officer  
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THROUGH: Ruth Brown, Department Clearance Officer  
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Planning and Regulatory Affairs  
Food and Nutrition Service (FNS)

FROM: Holly Figueroa, Social Science Research Analyst  
Special Nutrition Evaluation Branch  
Food and Nutrition Service (FNS)

SUBJECT: Justification for Non Material/Non-Substantive Update to OMB Control No:  
0584-0607 Child Nutrition Program Operations Study-II to Update the State  
Director Survey and SFA Director Survey

FNS is requesting a non-substantive change to the Child Nutrition Program Operations Study-II, OMB Control No. 0584-0607; expiration date 7/31/2020.

The objective of the Child Nutrition Program Operations Study-II (CNOPS-II) is to collect timely data on policy, administrative, and operational issues within the CN Programs. The study will collect data using online surveys regarding school year (SY) 2017-18. The information will be collected from a nationally representative sample of approximately 1,750 School Food Authority (SFA) Directors and a census of 55 State CN Directors. Questions on the State and SFA Director Surveys relate to school and student participation, meal prices, meal benefit eligibility, food service operations, revenues, and expenditures. This study is an annual data collection, whereby some topics are included in each year of data collection, while others can be added or removed as FNS priorities change. This is a request to update and prioritize data collection topics since the SY 16-17 data collection (approved under OMB Control No. 0584-0607; expiration date 7/31/2020).

FNS is seeking approval to add two topic areas to the **State CN Director Survey** (Appendix A) in 2017-18:

- Buy American/Local Food Purchasing
- Farm to School

These topic areas will replace the following 3 modules, which have been deleted for SY 2017-18:

- SFA Procurement Practices
- The Free and Reduced Price Meal Application
- USDA Grants

The State CN Director Survey is included as an attachment (Appendix A). The new modules were pre-tested with 2 respondents, and appropriate adjustments were made based on pre-test respondent feedback. The total estimated time to complete the survey is not impacted by these substitutions; the burden of 2 hours previously approved by OMB is adequate for this proposed data collection from State Agency Directors. Exhibit 1 lists the previously approved modules that have been deleted and the newly proposed modules for this survey.

Exhibit 1. Proposed Changes to the State CN Director Survey by Module

	Year 2 (approved)	Year 3 (proposed)
SFA Procurement Practices	X	
The Free and Reduced Price Meal Application	X	
USDA Grants	X	
Buy American/Local Food Purchasing		X
Farm to School		X

FNS is also seeking approval to add several topic areas to the **SFA Director Survey** (Appendix B) in 2017-18. In particular, the following 3 modules will be added:

- Financial Management
- Food and Beverage Marketing
- Buy American/Local Food Purchasing

These topic areas will replace the following 3 modules, which have been deleted for SY 2017-18:

- SFA Procurement Practices
- Smart Snacks in School Standards
- The Free and Reduced Price Meal Application

A single, open-ended final remarks question that was included in the Year 2 (SY 2016-17) SFA Director Survey has also been removed from the Year 3 (SY 2017-18) instrument.

The Year 3 (SY 2017-18) SFA Director Survey is included as an attachment (Appendix B). The new modules have been pre-tested with 6 respondents and adjustments have been made per their feedback. The total estimated time to complete the survey is not impacted by these substitutions; the burden of 2 hours previously approved by OMB is adequate for this proposed collection from SFA Directors. Exhibit 2 lists the previously approved modules that have been deleted and the newly proposed modules for this survey.

Exhibit 2. Proposed Changes to the SFA Director Survey by Module

	Year 2 (approved)	Year 3 (proposed)
Financial Management		X
Food and Beverage Marketing		X
Smart Snacks in School Standards	X	
SFA Procurement Practices	X	
The Free and Reduced Price Meal Application	X	
Buy American/Local Food Purchasing		X

Consistent with the design of CNOPS-II, additional changes have been made to questions throughout both the State CN Director and SFA Director surveys to reflect feedback from the Year 2 (SY 2016-17) data collection as well as changes to FNS priorities for Year 3 (SY 2017-18). However, these questions remain within the existing topic areas, in the same general lines of inquiry as those that were included in the previously approved instruments, and within the already approved burden of 2 hours per instrument for respondents. Questions that have not previously been reviewed by OMB are marked as “New” on the attached survey instruments (Appendices A and B).

The burden table (Exhibit 3 and Appendix C) displays the estimated burden hours for this collection. The respondent groups, total number of respondents and non-respondents, and time to respond for these proposed updates are unchanged from the already approved ICR. The only change to the burden table for Year 3 reflects slight changes in the number of State and SFA respondents that participated in the pretest. In Year 2, three State CN Directors were recruited to participate in the pretest and all responded. In Year 3, another three State CN Directors were recruited for the pretest; however, only 2 eventually responded. Therefore, in comparison to Year 2, Year 3 has one fewer respondent and one additional non-respondent to the State CN Director pretest. This change in the number of respondents and non-respondents for Year 3 is offset, however, by a change in the number of respondents and non-respondents to the SFA Director Survey pretest. Six SFA Directors were recruited to pretest the SFA Director Survey for both Years 2 and 3 but, whereas there were 5 respondents and one non-respondent for Year 2, all 6 SFA Directors responded to the Year 3 pretest. Thus, the total number of respondents (1,813) and non-respondents (1,566) remains the same from Year 2 to Year 3, and the estimated total annual burden remains unchanged at 4,099.37 hours.

Once OMB approves these changes, FNS intends to update the State and SFA Director Surveys online and proceed with data collection.

If you have any questions regarding this request, please contact Christina Sandberg, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2337.

#### Appendices

Appendix A: State CN Director Survey CNOPS-II Year 3

Appendix B: SFA Director Survey CNOPS-II Year 3

Appendix C: Burden Table CNOPS-II Year 3

Exhibit 3. Burden Table

State / Local Government		Responsive					Non-Responsive					All	
Type of respondents	Type of survey instruments	Sample Size	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Total Annual hour burden
CN Directors	Hard copy pre-test	3	2	1	2	3	6	1	1	1	0.50	0.50	6.50
CN Directors	Web-based Survey	55	55	1	55	2	110	0	0	0	0.08	0	110.00
CN Directors	Invitation Letter	55	22	1	22	0.05	1.1	33	1	33	0.03	1.1	2.20
CN Directors	Follow-up email*	33	13	1	13	0.05	0.65	20	1	20	0.03	0.66667	1.32
CN Directors	Reminder Email - Week 2*	20	8	1	8	0.05	0.4	12	1	12	0.03	0.4	0.80
CN Directors	Reminder Email - Week 4*	12	5	1	5	0.05	0.25	7	1	7	0.03	0.23333	0.48
CN Directors	Reminder Email - Week 6*	7	3	1	3	0.05	0.15	4	1	4	0.03	0.13333	0.28
CN Directors	Telephone Reminder - Week 7*	4	2	1	2	0.083	0.167	2	1	2	0.03	0.06667	0.23
CN Directors	Telephone Reminder - Week 8*	2	2	1	2	0.083	0.167	0	0	0	0.03	0	0.17
CN Directors	Thank You Letter	55	55	1	55	0.05	2.75	0	0	0	0.03	0	2.75
CN Directors	Email Notification & FAQ	55	55	1	55	0.5	27.5	0	0	0	0.03	0	27.50
SFA Directors	Hard copy pre-test	6	6	1	6	3	18	0	0	0	0.50	0	18
SFA Directors	Web-based Survey	2,188	1,750	1	1,750	2	3,500	438	1	438	0.083	36.50	3,536.50
SFA Directors	Invitation Letter	2,188	656	1	656	0.05	32.80	1,532	1	1,532	0.03	51	83.87
SFA Directors	Follow-up email**	1,532	383	1	383	0.05	19.15	1,149	1	1,149	0.03	38	57.45
SFA Directors	Reminder Email - Week 2**	1,149	287	1	287	0.05	14.35	862	1	862	0.03	29	43.08
SFA Directors	Reminder Email - Week 5**	862	129	1	129	0.05	6.45	733	1	733	0.03	24	30.88
SFA Directors	Reminder Email - Week 7**	733	110	1	110	0.05	5.50	623	1	623	0.03	21	26.27
SFA Directors	Telephone Reminder - Week 8**	623	93	1	93	0.083	7.75	530	1	530	0.03	18	25.42
SFA Directors	Telephone Reminder - Week 9**	530	53	1	53	0.083	4.42	477	1	477	0.03	16	20.32
SFA Directors	Telephone Reminder - Week 10**	477	39	1	39	0.083	3.25	438	1	438	0.03	15	17.85
SFA Directors	Thank You Letter	1,750	1,750	1	1,750	0.05	87.50	0	0	0	0.03	0	87.50
<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>	<b>6,861</b>	<b>0.037</b>	<b>251.07</b>	<b>4,099.37</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%.