

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-NEW:**

**Contact Information of Schools That Participate in the National School Lunch Program  
and Organizations That Participate in the USDA's Child and Adult Care Food Program**

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**A1. 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.**

The collection of this information aims to help the mission of USDA's Team Nutrition Initiative, which is to support national efforts to promote lifelong healthy food choices and physical activity by improving the nutrition practices of the Child Nutrition Programs. The contact information that FNS collects will create a stronger network of interested schools and a new network of organizations in the CACFP working together towards a healthier environment in schools and child care sites that participate in Child Nutrition Programs respectively. It helps to keep these entities up-to-date with the available resources developed under the Team Nutrition Initiative to support the nutrition standards of their respective Child Nutrition Programs. The Team Nutrition initiative of the United States Department of Agriculture's Food and Nutrition Service falls under SEC. 19. [42 U.S.C. 1788] TEAM NUTRITION NETWORK, Child Nutrition Act of 1966 (Appendix 12). This collection will help achieve the purposes of Team Nutrition Network included in sec. 19 [42 U.S.C. 1788] (a)(1)-(5) and as cited below

The purposes of the team nutrition network are—

- (1) to establish State systems to promote the nutritional health of school children of the United States through nutrition education and the use of team nutrition messages and material developed by the Secretary, and to encourage regular physical activity and other activities that support healthy lifestyles for children, including those based on the most recent Dietary Guidelines for Americans published under section 301 of the National Nutrition Monitoring and Related Research Act of 1990 (7 U.S.C. 5341);
- (2) to provide assistance to States for the development of comprehensive and integrated nutrition

education and active living programs in schools and facilities that participate in child nutrition programs;

(3) to provide training and technical assistance and disseminate team nutrition messages to States, school and community nutrition programs, and child nutrition food service professionals;

(4) to coordinate and collaborate with other nutrition education and active living programs that share similar goals and purposes; and

(5) to identify and share innovative programs with demonstrated effectiveness in helping children to maintain a healthy weight by enhancing student understanding of healthful eating patterns and the importance of regular physical activity.

## **A2. 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 how the agency has actually used the information received from the current collection.**

- For the schools participating in the Child Nutrition Programs, FNS has collected information from them via the Team Nutrition enrollment form in order to communicate releases and updates of Team Nutrition Resources. The Team Nutrition School form was submitted and approved under OMB# 0584-0524 titled Generic Clearance to Conduct Formative Research (as part of the submission for the Consumer Research for Nutrition Education and Promotion Activities)(expiration date 9/30/2019). Since that approval, FNS has decided to expand the database to collect information from the CACFP organizations, as well as from the schools. Based on the decision to expand the database, FNS has decided to create a new information collection to cover both forms and the database. In order to reach CACFP program operators and providers, FNS is expanding the data collection to interested CACFP organizations (such as Sponsoring Agencies and Independent Centers). Eligible entities, like schools, sponsors, and program operators will be notified of the availability of this enrollment and learn about the initiative. The collection of this information is voluntary. Interested entities will voluntarily submit their entity contact information, including the name of the entity, the entity's address, phone number, website, point of contacts' email address, estimated number of participants, school grade levels the nutrition and wellness activities conducted by CACFP, and the name of the USDA's Child Nutrition Program. This information will be collected through the online forms FNS 891 (Appendix 10) for schools and FNS 892 (Appendix 11) for CACFP organizations, which will be part of the database/application. No hard copy will be available. USDA's Team Nutrition staff will evaluate this information as a process to validate and approve this request. The collected information will be posted in the website database/application, creating a network system for peer collaboration for childhood nutrition & wellness. Team Nutrition will also use email addresses to send electronic

correspondence, such as monthly newsletters and promotions that announce the availability of new and updated Team Nutrition materials that support nutrition education and provide technical assistance to foster an environment of health. The frequency of the collection will be annually since respondents are expected to submit one update per year. Respondents can submit their new enrollment or updates any time of the year. Team Nutrition sends an annual reminder to all respondents to submit changes as needed. The collected information will be publicly available and upon request, Team Nutrition shares **information** with stakeholders. There have been some changes to the requirements for the Team Nutrition school form. The form included in this request differs from the one that was originally approved under OMB #0584-0524 in that the new form requests a Wellness Coordinator name with email address, removes the fax number, and includes changes in layout to facilitate the collection in a new and mobile accessible platform.

### **A3. Use of information technology and burden reduction.**

**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 of 2002 to promote the use of technology. This data collection will be conducted through a web-based application using Drupal 8 with a mobile-friendly design which allows users to easily access the online enrollment forms anytime from smart devices and traditional computers. Copies of the online Team Nutrition enrollment forms are provided in Appendices 10 and 11. FNS estimates that all 367,992 responses (100%) will be collected electronically.

#### **A4. 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 purposes described in Question 2.**

At this moment, FNS has a database to collect contact information for schools that participate in the USDA's National School Lunch Program; however, it doesn't have a database that collects the contact information of sponsoring organizations or institutions for USDA's Child and Adult Care Food Program. This data collection will support the communication of Team Nutrition with Child Nutrition Programs.

#### **A5. Impacts on small businesses or other small entities.**

**If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

This data collection has a low impact on small business as it collects basic contact information in an easy and accessible way. The forms will be available online and it is intended to have a mobile friendly design so that the public can access it through mobile devices. Most of the fields/questions on the collection forms will have easy to respond questions to minimize the burden of the public when completing or updating the enrollment form. FNS estimates that out of the 122,664 respondents for this collection, 20,160 respondents (16.4 %) will be small entities.

#### **A6. Consequences of collecting the information less frequently.**

**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 information is collected for the purpose of providing Child Nutrition Program's operators with Team Nutrition technical assistance and nutrition education resources that support national

efforts to promote lifelong healthy food choices and physical activity by improving the nutrition practices of the Child Nutrition Programs as soon as they become available. Collecting data less frequently would delay the use and implementation of these resources that aim to meet the Child Nutrition Program nutrition standards. USDA, Food and Nutrition Service (FNS) will send out periodic reminders, at least twice a year to Child Nutrition Program's operators to make sure the information is current. An example of a reminder notification to school is included in Appendix 13.

#### **A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.**

**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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

#### **A8. Comments to the Federal Register Notice and efforts for consultation.**

**If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden.**

**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 format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The 60 Day-Notice for this Information Collection Request was published in the Federal Register on Thursday, November 2, 2017 (Vol. 82, pages 50856-50858). The public comment period ended on January 2, 2018. State agencies were informed through a PartnerWeb notification about the period to submit comments to this notice.

FNS received seven comments in response to the notice of which two were relevant comments and the remaining comments were not germane to the information collection.

Comments received from Iowa State agency (Appendix 1) and School Nutrition Association (Appendix 2) expressed in general the need to collect this information in a way that is simple, mobile friendly, and easy to share with others. Team Nutrition responded to these comments (Appendix 8 and 9), mentioning that the updated forms will be available online and it is intended to have a mobile-friendly design so that the public can access it through mobile devices. The fields will have easy to respond questions to minimize the burden of the public when completing or updating the enrollment form.

The following individuals or organizations are either respondents or interested parties in the collection that have been consulted about this information collection:

**1. Organization:** School Nutrition Association  
**Name:** Nadia Davis  
**Mailing Address:** 120 Waterfront Street Suite 300  
National Harbor, Maryland 20745  
**Email Address:** ndavis@schoolnutrition.org  
**Phone Number:** 301-686-3149

**2. Organization:** Iowa Department of Education  
**Name:** Patti Delger  
**Mailing Address:** 400 E. 14th St.  
Des Moines, IA 50319-0146  
**Email Address:** patti.delger@iowa.gov  
**Phone Number:** 515-281-5676

**3. Organization:** National CACFP Sponsor Organization  
**Name:** Lisa Mack  
**Mailing Address:** PO Box 1748  
Round Rock, TX 78680  
**Email Address:** lisa@cacfp.org  
**Phone Number:** 512-688-9356

**A9. Explain any decisions to provide any payment or gift to respondents.**

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

The respondents will not receive gifts or remuneration, instead they will receive monthly electronic correspondence regarding new and updated Team Nutrition materials that support nutrition education and provide technical assistance to foster an environment of health.

**A10. Assurances of confidentiality provided to respondents.**

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

The Department complies with the Privacy Act of 1974. The information to be collected includes contact information of entities/businesses that operate a USDA's Child Nutrition Program and nutrition and wellness best practices followed by this entity, not personal information. Respondents will be informed that the information collected will be publicly available to foster peer connections and collaboration. This information collection does not request any personally identifiable information, nor does it include a form that requires a Privacy Act Statement.

The collected work emails are needed for communication with interested point of contacts at schools or child care sites concerning childhood nutrition and wellness at their sites. This information will be protected as it will be hidden in the database/application and only available when the respondents click to update the school or CACFP organization information.

**A11. Justification for any questions of a sensitive nature.**

**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 information collection will be a voluntary response and will have questions to collect information about the type of program managed by the entity, including contact information of key staff and nutrition and wellness best practices followed by the entity. Some respondents may include their personal email address, which is personal identifiable information but the requirement is work email address. Emails will be protected as this information will be hidden

in the online database/application and only available when the respondents click to update the record for the school or CACFP organization. This information will allow FNS to make targeted promotions to the program operators and foster a peer-to-peer network as the information is publicly available.

**A12. Estimates of the hour burden of the collection of information.**

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

**A. 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.**

With this new information collection submission, there are 122,664 respondents, 367,992 responses, and 35,914 burden hours. The total estimated number of respondents is approximately 122,664; 22,664 are CACFP's organizations and 100,000 are schools. For CACFP organizations, the total is broken down as follows: 20,095 CACFP sponsors: centers only; 791 CACFP sponsors of all home care; and 1,778 CACFP sponsors of adult care. The CACFP's organization and the schools will be asked to voluntarily complete one (1) enrollment form and submit changes as needed. The estimated total annual burden on respondents is 35,914 hours. This total is based on the estimated time of response which varies from 0.025 to 0.25 hour (1.5-15 minutes), with an average estimated time of 0.14 hour for all participants.

Estimated Total Annual Burden on Respondents: 35,914 hours. See the table below for estimated total annual burden for each type of respondent.

Affected Public	Respondent Type	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dxe)
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<b>Reporting Burden</b>						
Businesses or Other for Profit, Not-for-Profit	CACFP Organizations (completed form) – CACFP Sponsors: Centers Only	20,095	1	20,095	0.25	5,023.75
	CACFP Organizations (completed form) – CACFP Sponsors of All Home Care	791	1	791	0.25	197.75
	CACFP Organizations (completed form) – CACFP Sponsors of Adult Care	1,778	1	1,778	0.25	444.5
Changes/Updates	CACFP Organizations (updated form)	22,664	1	22,664	0.083	1,881.11
Reminder notification	CACFP Organizations (read note)	22,664	1	22,664	0.025	566.60
<b>Subtotal of Businesses or Other for Profit, Not-for Profit</b>				<b>67,992</b>		<b>8,113.71</b>
State, Local, or Tribal Government	Schools (completed form)	100,000	1	100,000	0.17	17,000
Changes/Updates	Schools (updated form)	100,000	1	100,000	0.083	8,300
Reminder notification	Schools (read note)	100,000	1	100,000	0.025	2,500
<b>Subtotal for State, Local, or Tribal Government</b>				<b>300,000</b>		<b>27,800</b>
<b>Total Reporting Burden</b>		<b>122,664</b>		<b>367,992</b>		<b>35,913.71</b>

**B. Provide estimates of annualized cost to respondents for the hour burdens for**

**collections of information, identifying and using appropriate wage rate categories.**

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2017 National Occupational and Wage Statistics, Occupational Group (25-0000) ([http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)). The hourly mean wage (for Food Service Manager for functions performed by local program operators) are estimated at \$27.52 per staff hour.

Total cost to the public = 35,914 hours x \$27.52 = \$988,353.28

**A13. Estimates of other total annual cost burden.**

**Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 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/maintenance costs are estimated in this information collection request.

**A14. Provide estimates of annualized cost to the 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 estimated total cost to the Federal government is \$1,306,437.06, with an average annual cost of \$435,479.02. The table below includes a cost breakdown per year of the estimated expenses for this collection of information. This estimate is based on an initial investment for the application design, development, and start-up contract of \$285,375.00 during the first year plus \$340,354.02 annual cost among the three years of the collection. The annual costs include \$60,000 for Hosting and Operation & Management costs, conducted by the Office of

Information and Technology within USDA’s Food and Nutrition Service. In addition, the estimated annual salary cost for the review of applications by federal employee is \$280,354.02 using the [OPM Salary Table 2018-DCB](#) (for the Washington, DC, MD, VA, WV, and PA area). This annual cost is calculated using an [average basic hourly pay rate](#) of \$44.72/hr (Program Analyst GS- 13, step 1 and Nutritionist GS-12, step 4) multiplied by 6,256 hours (367,992 responses x 0.017 hours) to review all applications received plus the oversight ten hours per year multiply by the basic hourly pay of a Branch Chief GS-14 step 3 (\$58.57/hour).

	Design and Development	Hosting & Maintenance Fees	Salaries	Total
1 <sup>st</sup> year	\$285,375.00	\$60,000.00	\$280,354.02	\$625,729.02
2 <sup>nd</sup> year	-	\$60,000.00	\$280,354.02	\$340,354.02
3 <sup>rd</sup> year	-	\$60,000.00	\$280,354.02	\$340,354.02
TOTAL	\$285,375.00	\$180,000.00	\$841,062.06	\$1,306,437.06

**A15. Explanation of 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 submission is a new information collection request as a result of program changes and will add 35,914 burden hours and 367,992 responses to OMB’s inventory.

**A16. 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.**

All information collected will be available to the general public once reviewed and revised by USDA, Food and Nutrition Service to validate the information is true and free of errors. This

information includes the name of the entity, address, phone number, the name of the Child Nutrition Program that the entity participates in, enrollment, and key point of contacts per entity. This information will be available at the Team Nutrition Application page, which is under development and will be linked to Team Nutrition website. On a monthly basis, Team Nutrition will check how many schools and CACFP organizations are enrolled and on a weekly basis requests to enroll or update will be reviewed by Team Nutrition staff. Otherwise, this collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

**A17. Displaying the OMB Approval 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.**

USDA, Food and Nutrition Service will include the Expiration Date for OMB Approval as part of the information collection forms.

**A18. Exceptions to the certification statement identified in Item 19.**

**Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."**

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