

Supporting Statement Part A  
**Farm to School Census and Comprehensive Review**

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## Contents

1.	Circumstances that Make the Collection of Information Necessary.....	5
2.	Purpose and use of the Information.....	7
3.	Use of Information Technology and Burden Reduction.....	10
4.	Efforts to Identify Duplication.....	11
5.	Impacts on Small Businesses or Other Small Entities.....	12
6.	Consequences of Collecting the Information Less Frequently.....	12
7.	Special Circumstances Relating to the Guidelines of CFR 1320.6.....	13
8.	Comments to the Federal Register Notice and Efforts for Consultation.....	14
9.	Explain any Decisions to Provide any Payment or Gift to Respondents. ....	18
10.	Assurances of Confidentiality Provided to Respondents.....	18
11.	Justification for any Questions of a Sensitive Nature.....	20
12.	Estimates of the Hour Burden of the Collection of Information.....	20
13.	Estimates of Other Total Annual Cost Burden.....	24
14.	Provide Estimates of Annualized Cost to the Federal Government.....	24
15.	Explanation of Program Changes or Adjustments.....	25
16.	Plans for Tabulation, and Publication and Project Time Schedule.....	25
17.	Displaying the OMB Approval Expiration Date.....	27
18.	Exceptions to the Certification Statement Identified in Item 19.....	27

## Tables

Table A-1. Overview of Data Collection Activities.....	8
Table A-2. External Consultants.....	17
Table A-3. Farm to School Census and Distributor Interview Reporting Burden.....	23
Table A-4. Reporting Schedule.....	26

## Appendices

A. Section 18 of the Richard B. Russell National School Lunch Act	
B. Section 305 of the 2010 Healthy Hunger Free Kids Act	
C. Distributor Interview Telephone Script	
D. Census Survey	
E. Census Survey - Screenshots	
F. Distributor Interview Recruitment Email	
G. Distributor Interview Frequently Asked Questions (FAQs)	
H. Distributor Interview Scheduling Phone Script	
I. Distributor Interview Confirmation Email	
J. Distributor Interview Thank You Email	
K. Census Recruitment Email from FNS to State Child Nutrition Directors	
L. Census Recruitment Email from Study Team to State Child Nutrition Directors	
M.1. Pre-Census Recruitment Email from State Child Nutrition Directors to SFAs (Email from Study Team to State Child Nutrition Directors)	
M.2. Pre-Census Recruitment Email from State Child Nutrition Directors to SFAs (Template for State Child Nutrition Directors to send to SFAs)	
N.1. Census Reminder Emails from State Child Nutrition Directors to SFAs (Email from Study Team to State Child Nutrition Directors)	
N.2. Census Reminder Emails from State Child Nutrition Directors to SFAs (Template for State Child Nutrition Directors to send SFAs)	
O. Census Recruitment Email from FNS to State Department of Agriculture Directors	
P. Census Invitation and Reminder Emails from Study Team to SFAs	
Q. Census Frequently Asked Questions (FAQs)	
R. Census Preparation Worksheet	
S. Census Follow-up Telephone Script	
T. Census Thank You Email	
U1. 60-Day Federal Register Notice Comments Received Hanna	
U2. 60-Day Federal Register Notice Comments Received Frinzell	
U3. 60-Day Federal Register Notice Comments Received Herritt	
U4. 60-Day Federal Register Notice Comments Received Jean Public	

- U5. 60-Day Federal Register Notice Comments Received Helget
- U6. 60-Day Federal Register Notice Comments Received Ragalie-Carr
- U7. 60-Day Federal Register Notice Comments Received Fogel
- U8. 60-Day Federal Register Notice Comments Received Harvey
- U9. 60-Day Federal Register Notice Comments Received Herald
- V1. 60-Day Federal Register Notice Responses to Comments Hanna
- V2. 60-Day Federal Register Notice Responses to Comments Frinzell
- V3. 60-Day Federal Register Notice Responses to Comments Herritt
- V4. 60-Day Federal Register Notice Responses to Comments Jean Public
- V5. 60-Day Federal Register Notice Responses to Comments Ragalie-Carr
- V6. 60-Day Federal Register Notice Responses to Comments Fogel
- V7. 60-Day Federal Register Notice Responses to Comments Harvey
- V8. 60-Day Federal Register Notice Responses to Comments Herald
- W. NASS Comments
- X. Responses to NASS Comments
- Y. Summary of Pretest Findings and Changes
- Z. Federal-Wide Assurance (FWA) Certificate
- AA. Confidentiality Agreement
- AB. Estimates of Respondent Burden
- AC. IRB Exemption Certificate
- AD. Summary of Data Collection Activities

## **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.**

**Introduction:** The intended purpose of this information collection is to create a Comprehensive Farm to School Report that will include a cumulative assessment of the scope, accomplishments, and potential of the farm to school activities of the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS). The results of this study will be used to improve the methods and tools used by the USDA FNS to describe the impact and benefits of various farm to school activities administered by grantees, schools, school food authorities (SFAs), and other stakeholders. Ultimately, the study will produce a first-of-its-kind report—a comprehensive assessment of farm to school from 2010 to 2020. Specifically, this report will: (1) identify and describe the economic contribution of farm to school across various geographies by examining the procurement process; (2) assess the impacts of farm to school efforts on food growing, serving, and purchasing at the SFA level; (3) identify and describe how farm to school programs and activities have impacted changes in policy, systems, or structure; (4) assess the current reporting mechanisms and reporting content, alongside recommendations for improvement, to understand the Farm to School grantee evaluation efforts, and; (5) analyze and describe the outcomes and impacts attributable to the Farm to School Grant program in the current year and cumulatively.

**Study Background:** Section 18 of the Richard B. Russell National School Lunch Act (NSLA; see Appendix A)<sup>a</sup> authorized and funded USDA to establish a farm to school program in order to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve access to local foods in schools. This work is housed within the USDA FNS Office of Community Food Systems (OCFS). In an effort to measure progress towards increasing the availability of local foods in schools, the OCFS conducted a nationwide Farm to School Census in 2013 (OMB Control No. 0536-0069, expiration date 2/29/2016, led by the USDA Economic Research Service) and 2015 (OMB Control No. 0584-0593, discontinued date 2/29/2016). USDA’s Farm to School Program uses data from the Farm to School Census to assess farm to school programs and to set priorities for USDA outreach and technical support, as mandated by the NSLA. This third iteration of the Census (2019 Farm to School Census, herein referred to as the “Census”) will allow FNS to make comparisons of farm to school activities and trends nationally across time and help contribute to a comprehensive review of farm to school activities over the 10 year period since the USDA Farm to School grant program was established.

Informed by an extensive literature review and gap analysis, this study includes two primary data collection efforts, in which all institutions and entities participating in FNS programs such as Farm to School are strongly encouraged to participate per Section 305 of the Healthy Hunger Free Kids Act of 2010 (P.L. 111-296) (Appendix B). First, the study team will conduct and report on a Distributor Interview (Appendix C) to obtain the perspectives of large-scale food distributors on the processes and challenges to local food purchasing and procurement. Second, the study team will conduct and report on the 2019 Farm to School Census (Appendices D and E) with the aim of describing the multiple facets

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<sup>a</sup> 42 U.S.C. 1769

of farm to school, including the USDA Farm to School Grant Program and expansion of farm to school efforts across the country documented by the Census and other data sources. The Comprehensive Farm to School Report will also incorporate data that have already been collected as part of the standardized grantee reporting system (Uniform Grant Application for Non-Entitlement Discretionary Grants, OMB Control #0584-0512, expiration date March 31, 2019). Reports from this standardized system will be used to describe activities that result directly from the USDA Farm to School Grant program and to inform future efforts for grantee reporting and evaluation.

- 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.**

***How the information will be used:*** The results of this study will be used by FNS to improve the methods and tools used to describe the impact and benefits of farm to school activities administered by grantees, schools, School Food Authorities (SFAs), and other stakeholders. Once completed, FNS will make the study reports available on their website.<sup>b</sup> OCFS will also use data to direct training, technical assistance, and outreach efforts in the areas of local food procurement and school gardens. For example, OCFS used data from the 2013 and 2015 Censuses to enhance local procurement trainings to target underutilized products, incorporate garden-grown produce, and address barriers reported by SFAs. Additionally, OCFS was able to identify low-performing states and provide direct customer service to those who were interested in expanding farm to school efforts. The Distributor

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<sup>b</sup> <https://www.fns.usda.gov/ops/research-and-analysis>

Interview is exploratory and the results from that survey will be used to determine whether a larger survey is feasible or desirable.

The purpose of these data collection efforts is to answer three broad study objectives:<sup>c</sup> (1) identify and describe the economic contribution of farm to school across various geographies by examining the procurement process; (2) assess the impacts of farm to school efforts on food growing, serving, and purchasing at the SFA level; and, (3) identify and describe how farm to school programs and activities have impacted changes in policy, systems, or structure.

***From whom and how the information will be collected:*** Table A-1 provides an overview of the data collection instruments, number of potential respondents, method of collection, and purpose.

**Table A-1. Overview of Data Collection Activities**

<b>Instrument</b>	<b>Respondents</b>	<b>Method of Collection</b>	<b>Length</b>	<b>Purpose</b>	<b>Frequency</b>
Distributor Interview (Appendix C)	20 school food distributors	Phone	60 minutes	To obtain the perspectives of large-scale food distributors on the processes and challenges to local food purchasing and procurement.	Once
Census (Appendices D and E)	16,000 SFAs	Web survey	30 minutes	To describe the multiple facets of farm to school, including the USDA Farm to School Grant Program and expansion of farm to school efforts across the country.	Once

<sup>c</sup> Of the five objectives for the entire research project, which includes a review of the Farm to School Grant program data (mentioned in Section 1), three are relevant to this information collection. The other objectives do not involve data collection.



For further information concerning the data collection activities for the Distributor Interview see Appendix AD (including a description of Appendices F [Distributor Interview Recruitment Email], G [Distributor Interview Frequently Asked Questions (FAQs)], H [Distributor Interview Scheduling Phone Script], I [Distributor Interview Confirmation Email], and J [Distributor Interview Thank You Email]).

For further information concerning the data collection activities for the Census see Appendix AD (including a description of Appendices K [Census Recruitment Email from FNS to State Child Nutrition Directors], L [Census Recruitment Email from Study Team to State Child Nutrition Directors], M [Pre-Census Recruitment Email from State Child Nutrition Directors to SFAs], N [Census Reminder Emails from State Child Nutrition Directors to SFAs], O [Census Recruitment Email from FNS to State Department of Agriculture Directors], P [Census Invitation and Reminder Emails from Study Team to SFAs], Q [Census Frequently Asked Questions (FAQs)], R [Census Preparation Worksheet], S [Census Follow-up Telephone Script], and T [Census Thank You Email].

***Frequency of information collected:*** The Distributor Interview and Census will be completed once in school year 2018-2019 with approximately 20 school food distributors and 16,000 SFA director respondents, respectively. Data collection will span approximately 6 months.

***Information shared with any other organizations inside or outside USDA or the government:*** Results will be presented in aggregated form in the final study report, which will be shared with OCFS and be made public on the USDA-FNS website:

<http://www.fns.usda.gov/ops/research-and-analysis>. Consistent with previous Census data, data from the 2019 Census will also be made publicly available.<sup>d</sup>

- 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.**

FNS is committed to complying with the E-government Act of 2002 to promote the use of technology. Wherever possible, improved technology has been incorporated into data collection protocols to reduce respondent burden.

The Distributor Interview (Appendix C) will be conducted by phone and will be audio recorded and administered using an editable PDF to efficiently collect complete and accurate data while minimizing respondent burden. Staff will be trained prior to conducting interviews by phone in order to ensure that they accurately follow skip patterns and omit questions during the interview.

The Census (Appendix D/E) will be conducted as an online survey. The survey invitation and reminder emails from the study team to SFAs (Appendix P), with links to the web survey, will be sent using the Conformat Horizons software package. Like other sophisticated web survey software, Conformat facilitates the design of input screens that visually guide respondents through the instrument and encourage accurate data entry.

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<sup>d</sup> For more information about publicly available data from previous versions of the Census, see: <https://farmtoschoolcensus.fns.usda.gov/data-explorer>

While up to 2,681 of initial Census nonrespondents will be offered the opportunity to complete the survey by phone during the follow-up calls (Appendix S), the responses will still be collected through the web survey platform; thus, all 16,000 anticipated responses to the Census are expected to be completed electronically. FNS estimates that out of the 227,965 total responses for this collection (136,743 from respondents and 91,222 from nonrespondents), approximately 7.02 percent (16,000) will be 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 purposes described in Item 2 above.**

Every effort has been made to avoid duplication. The data requirements for the study have been carefully reviewed and no similar data collection is available. The information required for this study is not currently reported to FNS on a regular basis in a standardized form, nor is the information available from any other previous or contemporary study. This third iteration of the Census will allow FNS to make comparisons of farm to school activities and trends nationally across time and help contribute to a comprehensive review of farm to school activities since the USDA Farm to School grant program was established in 2010. Additionally, the study team has engaged in a literature review and gap analysis task to identify evidence gaps not already addressed in existing literature or other data collections, and to ensure that interview/survey questions for both the Distributor Interview (Appendix C) and Census (Appendix D/E) are not duplicative with other data collections. This is a new information collection.

**5. 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.**

FNS estimates that one percent of potential respondents (approximately 200 SFAs) will be “small entities” as defined by OMB Form 83-I. Information being requested has been held to the minimum required for the intended use. Although there are small SFAs in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Collecting the requested information will not have a significant economic impact on these small entities.

**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.**

The data collection for the proposed study will be conducted one time only during SY 2018-19. These data are essential to track the farm to school efforts nationwide. Without this information, FNS will not be able to fully assess the benefits of farm to school activities and its progress. Specifically, in an effort to measure progress towards increasing the availability of local foods in schools, the FNS OCFS conducted a nationwide Farm to School Census in both 2013 and 2015. The 2019 Census instrument (Appendix D/E) will be based on the 2013 and 2015 Census, allowing the study team to look at trends over time and consider longer-term implications of the findings. Data collected from the 2019 Census will provide needed information on farm to school programming (gardens, salad bars, education) and local foods purchases (sourcing, procurement, variety of items) at the SFA and school levels, and will help FNS to address challenges with the program and inform FNS farm to school technical

assistance activities provided to States. Further, without information from the Distributor Interview (Appendix C), FNS will not obtain critical information on the processes, challenges, and economic scope and impacts of local food purchases.

**7. Explain any special circumstances that require the 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 CFR 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, 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.**

**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.**

*Federal Register Notice and Comments:* FNS published a notice in the *Federal Register* (Volume 83 Number 53, Pages 11955-11958) on March 19, 2018, specifying a 60-day period for comment ending May 18, 2018. Nine comments were received. Out of the nine comments received, FNS determined that one was not germane to the information collection as the comment was not related to the necessity or the practical utility of the information collection, nor did it address burden elements such as the cost, the time estimate for completing the collection, the burden, the frequency of the collection, or the method of the collection. Comments and FNS responses are provided in Appendices U1-U9 and V1-V8, respectively, and relevant comments are summarized below.

- *FNS should work to streamline data collection processes to minimize the impact on SFAs.*

While the 2019 Census (Appendix D/E) includes many of the same questions as in 2015, FNS has streamlined the instrument to provide a more straightforward experience for the respondent, but also one that provides more comprehensive data. FNS also chose to wait until 2019 to administer the survey to increase the time between censuses from two to four years. FNS intends to engage the States and SFAs early in the process to allow them to prepare Census responses ahead of time, including the provision of an optional pre-survey worksheet (Appendix R) to help SFAs gather and calculate the requisite information, as we plan to improve the validity of the data.

- *Updates to the Census should include additional questions on a broader range of topics.*

The final report will comprehensively examine farm to school and its progress since 2010, which will allow FNS to better describe the impact and benefits of farm to school activities administered by grantees, schools, School Food Authorities (SFAs), and other stakeholders. In addition to our colleagues throughout USDA, this study is also guided by an advisory panel of farm to school non-profit and academic stakeholders. Additionally, FNS is also conducting other studies that address some of the suggested topics.

- *The Census should include perspectives from farmers.*

FNS will not be interviewing farmers at this time.

- *Be clearer about what aspects of the ECE setting are captured. If the Census expands beyond ECE sites within school districts, the questions may not be relevant or feel like the right fit for ECE providers.*

The respondents are the SFA Child Nutrition Directors, as the Census data are only collected at the SFA-level. As a result, this effort will not include early childhood sites that are outside of SFAs.

- *Gathering information about farm to school programs sponsored by non-profit groups in the private sector would add information and insights to FNS's existing work.*

FNS is authorized to collect data on entities that participate in or administer its programs. Thus, all public and private (including nonprofit) SFAs that participate in the NSLP will have the opportunity to provide input on the 2019 Census.

**Consultations Outside the Agency:** In addition to soliciting comments from the public, FNS consulted with Mingshan Zheng from National Agricultural Statistics Service (NASS) on the study design and methodology. NASS comments and the response to NASS comments



appear in Appendix W and X). The individuals that have been consulted about this study and their affiliations are listed in Table A-2.

**Table A-2. External Consultants**

<b>Name</b>	<b>Title</b>	<b>Affiliation</b>	<b>Telephone</b>
Jeff O'Hara	Agricultural Marketing Specialist	Agricultural Marketing Service, U.S. Department of Agriculture (USDA)	202-756-2575
Katherine Ralston	Senior Agricultural Economist	Economic Research Service, U.S. Department of Agriculture (USDA)	202-694-5463
Anupama Joshi	Executive Director	National Farm to School Network	847-917-7292
Colleen Matts	Farm to Institution Specialist	Michigan State University	517-432-0310
Sandy Curwood	Director	Virginia Department of Education, Office of School Nutrition Programs	804-225-2074
Nessa Richman	Network Director	Farm-to-Institution New England (FINE)	802-369-3090
Eva Ringstrom	Senior Director of Impact	FoodCorps	212-596-7045
Becca Jablonski	Assistant Professor	Colorado State University	970-491-6133
Lydia Oberholtzer	Senior Research Assistant	Penn State University	301-891-0470
Ricardo Salvador	Senior Scientist	Union of Concerned Scientists	202-331-6956
Mingshan Zheng	Mathematical Statistician	National Agricultural Statistics Service (NASS), U.S. Department of Agriculture (USDA)	202-720-0830

Finally, feedback from the pretest participants was used to further refine and finalize the data collection instruments (see Appendix Y for a summary of feedback and corrective actions taken).

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

No payments or gifts will be provided to any respondents.

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

FNS complies with the Privacy Act of 1974 (5 USC §552a). The information gathered in this study will be kept private to the full extent permitted by law. Consent language will be provided in the introduction to both the Distributor Interview and Census (Appendices C and D/E), in verbal and written format, respectively.

The Census will use Conformat Horizons software to collect survey responses. Conformat as an organization invests considerable time refactoring code to ensure the software remains up to date and takes advantage of the latest technologies that boost security, performance, and reliability. HTTPS is enforced for transmission of all credentials, as well as enforced for all connections for the study team associates at the user level. The SQL server databases that store respondent/response data are behind the firewall and data can only be accessed through the Horizons application by our named users. No application users can access the database directly; the servers are only accessible by our database administrators. Conformat surveys are stateless and session-less. No user identifiable information is required when transmitting information between page submissions. A combination of hidden form fields and system-generated identifiers are able to identify a respondent and the correct state when moving from page to page. Pages use metadata code to prevent them from being cached, and no information is stored on a respondent's computer when the browser is closed.

For the Census, the study team will prepare a Restricted Use version of the data for internal FNS use and a Public Use version for the broader research community. The Restricted Use version will include data from both the Distributor Interview and the Census. The Public Use version will not include data from the Distributor Interview, given that the relatively small number of distributors would make it easy to identify respondents in the data. The Public Use files will be available in a similar way to the previous 2015 Census.<sup>e</sup> These files will remove (or mask, when removal is not possible) all personally identifiable information and be ready for copying and dissemination to the public.

All electronic data for the Census and Distributor Interview will be transferred using a secure portal website that uses FIPS 140-2 compliant encryption SSL/TLS protocols, and will be stored on secure drives with access restricted to staff associated with the project. The study team will destroy all data for the Census and Distributor Interview at the end of the contract.

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.

Abt Associates holds a current Federal-Wide Assurance (FWA) of compliance (Appendix Z) from the U.S. Department of Health and Human Services' Office for Human Research Protections, and maintains its own Institutional Review Board. The Abt IRB reviewed the proposed evaluation and determined it is eligible for exemption (Appendix AC). Lastly, all study team members who will conduct interviews will be required to sign a confidentiality agreement (Appendix AA).

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<sup>e</sup> For more information about publicly available data from previous versions of the Census, see: <https://farmtoschoolcensus.fns.usda.gov/data-explorer>

**11. Provide additional justification for any questions of a sensitive nature.**

Neither the Census (Appendix D/E) nor the Distributor Interview (Appendix C) contains questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information.**

**The statement should:**

- 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 submission, there are 20,083 respondents (16,078 respondents and 4,005 non-respondents), 227,965 responses (136,743 from respondents and 91,222 from nonrespondents), and 25,061.86 burden hours. Burden estimates were derived from consultations with the study advisory panel and pretest activities, and are provided by respondent type in Table A-3 and Appendix AB).

**State and Local Government**

Burden estimates for State and local governments are based on the amount of time required to review and respond to recruitment materials and to complete the Census survey. State/local government estimates include the universe of 55 States and territories, and 15,000 *public* SFAs (12,000 respondents and 3,000 nonrespondents) for a total burden of 18,813.15 hours. Estimated frequency of responses includes 8.51 responses per respondent and 22.78 responses per nonrespondent for a total of 102,549 responses and 68,340 nonresponses.

## **Businesses**

Burden estimates for businesses are based on the amount of time required to review and respond to recruitment materials, gather requested data, and participate in the Census survey (private SFAs) or Distributor Interview. Business estimates include 5,000 private SFAs (4,000 respondents and 1,000 nonrespondents) and 28 distributors (23 respondents [including 20 respondents and 3 pretest participants], and 5 nonrespondents) for a total burden of 6,248.71 hours. Estimated frequency of responses includes 8.50 responses per respondent and 22.77 responses per respondent for a total of 34,194 responses and 22,882 nonresponses.

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

The study team estimates that the total cost associated with this data collection will be \$1,555,891.51. This estimate is based on the number of burden hours multiplied by the mean hourly salary/wage rates for each respondent category (which comes to a total of \$1,169,843.24) with an additional \$386,048.27 added to that total to account for a fully loaded wage rate ( $\$1,169,843.24 \times 0.33$ ).

The estimated cost to State government is \$7,554.99 ( $\$44.89/\text{hr} \times 168.30$  hours). This includes State Child Nutrition Directors and State Department of Agriculture Directors (occupation code 11-9030 Education Administrators) and is based on the Bureau of Labor Statistics May 2017 wage data for Occupational Group 999200: State Government ([https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm)).

The estimated cost to local government, which includes public SFA Directors (occupation code 11-9030 Education Administrators) and is based on the Bureau of Labor

Statistics May 2017 wage data for Occupational Group 611000: Educational Services ([https://www.bls.gov/oes/current/naics3\\_611000.htm](https://www.bls.gov/oes/current/naics3_611000.htm)), is \$870,528.19 (\$46.69/hr x 18,644.85 hours).

The estimated cost to businesses, including private SFAs (occupation code 11-9030 Education Administrators) and food distributors (occupation code 11-3071), is based on the Bureau of Labor Statistics May 2017 wage rates for Occupational Group 611000: Educational Services ([https://www.bls.gov/oes/current/naics3\\_611000.htm](https://www.bls.gov/oes/current/naics3_611000.htm)) and Occupational Group 424000: Merchant Wholesalers, Nondurable Goods ([https://www.bls.gov/oes/current/naics3\\_424000.htm](https://www.bls.gov/oes/current/naics3_424000.htm)), respectively. The cost to private SFAs is \$290,030.39 (\$46.69/hr x 4,346.83 hours) and the cost to distributors is \$1,729.67 (\$46.90/hr x 36.88 hours), for a total cost of \$291,760.06 to businesses.

**Table A-3. Farm to School Census and Distributor Interview Reporting Burden**

- 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 or start-up costs, nor any operation, maintenance, or service purchase costs associated with this collection.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

The total annual cost for this data collection is \$898,383.13. This includes contractor costs of \$649,572.84 and FNS staff costs of 25,903.20 (for a total cost of \$675,476.04), with an additional \$222,907.09 added to account for fully loaded wages ( $\$675,476.04 \times 0.33$ ). The overall total cost to the Federal Government is \$2,026,428.12 over the 3-year period of the contract (November 2017 to November 2020). The largest cost to the Federal Government is to pay the contractor \$1,948,718.52 (\$649,572.84 annually) to conduct this study and deliver reports and data files. The information collection also assumes 520 hours of a Federal employee's time per year, estimated at a GS-12, Step 6 in the Washington, DC area at \$45.59 per hour for a total of \$71,120.40 (\$23,706.80 annually). In addition, we assume 40



hours annually for the Branch Chief, at GS-14, Step 1, at \$54.91 per hour for a total of \$6,589.20 (\$2,196.40 annually). Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2018 for the Washington, DC metro area locality.<sup>f</sup>

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

This is a new collection of information and will add 25,061 burden hours and 227,965 responses to OMB's inventory.

**16. For collections of information whose results will 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.**

Data collection will begin following OMB approval and run for approximately 6 months. Data file preparations will follow immediately so that data analysis can begin soon after data collection is complete.

The study team will use standard quantitative methods to analyze data from the Distributor Interview, Census, and grantee reports. Analyses will be conducted using a statistical software package, such as SAS or Stata. Principal analysis methods will be descriptive, including simple tabulations, as well as cross-tabulations by subgroup where appropriate. Statistical hypothesis testing (e.g., for differences across subgroups of grantees)

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<sup>f</sup> Office of Personnel Management, General Schedule, accessed February 2, 2018, at:[%20https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf)

will be performed only for the Census and grantee reporting data, as the Distributor Interview sample size is small and results are not intended to be representative.

Qualitative data from the Distributor Interview will be analyzed using NVivo 11 analytic software. The team will develop a codebook to guide the work of the NVivo data analysts. Peer coding will help ensure that team members code in a reliable way. Once the data are coded, the qualitative data will be analyzed using semantic content analysis, and responses will be analyzed by question for emerging themes.

Table A-4 shows the data collection, analysis, and reporting schedule for the final report and briefing:

**Table A-4. Reporting Schedule**

ACTIVITY	COMPLETION DATE
Request to State Directors for list of SFAs and Director contact information	1 week after OMB approval
Finalize sample frame for Census	1 week after OMB approval
Recruitment and non-response follow-up for Census	1 week to 24 weeks after OMB approval
Collect data for Census	6 weeks to 24 weeks after OMB approval
Recruitment and non-response follow-up for Distributor Interview	1 week to 24 weeks after OMB approval
Collect data for Distributor Interview	6 weeks to 24 weeks after OMB approval
Code and process data	March 2019 – October 2019
Analyze data and prepare Final Report and Briefing	November 2019 – June 2020

**Publication:** The Contractor will formally present study findings to FNS at an internal briefing. Following this briefing, the Contractor will submit a Final Report to FNS, and this

Report will then be prepared for publication and public dissemination. It will be found on the agency website: <https://www.fns.usda.gov/ops/research-and-analysis>

- 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.**

FNS will display the expiration date for OMB approval of the information collection on all instruments and recruitment materials, together with the OMB approval number.

- 18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.**

There are no exceptions to the certification. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.