

Supporting Statement Part A

Revision to OMB # 0584-0607

**Child Nutrition Program Operations Study II
(CN-OPS-II): Year 4**

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Holly Figueroa

Office of Policy Support

Food and Nutrition Service

United States Department of Agriculture

3101 Park Center Drive

Alexandria, VA 22302

Telephone: 703-305-2105

Email: Holly.Figueroa@fns.usda.gov

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PART A. JUSTIFICATION

Terms of Clearance

In approving the information collection request for the first year of the Child Nutrition Program Operations Study II (CN-OPS-II) (OMB Number 0584-0607; Expiration 4/30/2019), on 4/28/2016, OMB requested that the Food and Nutrition Service (FNS) at the United States Department of Agriculture (USDA) share with OMB nonresponse bias and standard error analytical results during the data analysis and reporting phase each year, prior to publication of findings. The Year 1 Notice of Action results were sent to OMB on January 9, 2017. The results of Years 2, 3, and 4 will be shared with OMB annually, starting with the Year 2 analysis, which was provided in July 2018.

Introduction/Abstract

This information collection request is for a revision of the approved collection for the CN-OPS-II (OMB Control No. 0584-0607, expiration date: 07/31/2020), which collects data from a nationally representative sample of approximately 1,750 School Food Authority (SFA) Directors and a census of 55 State Child Nutrition (CN) Directors using online surveys. This study is an annual data collection whereby some topics are included each year, while others can be added or removed as FNS priorities change. The previous OMB approval covered data collection from school year (SY) 2015-16 through SY 2018-19; however, because the data collection topics and research questions change each year, FNS again sought public comment for SY 2018-19 (as described in Part A, Question 8). Thus, this request is to update and prioritize data collection topics for the SY 2018-19 data collection. The primary changes with this revision involve the research questions and data collection instruments, which are included in Appendices A, C, and D.

A.1 Circumstances That Make the Collection of Information Necessary

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.

Circumstances that make the collection necessary. FNS administers Federal child nutrition food programs that provide nutritionally balanced meals and snacks to eligible children through 18 years of age.¹ The CN programs include the following major food assistance programs operating in schools: the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Fresh Fruit and Vegetable Program (FFVP), the Child and Adult Care Food Program

¹ Disabled adults enrolled in school up to age 21 may participate in the school meals programs, and persons under the age of 21 currently admitted to Residential Child Care Institutions (RCCI) as residents are also eligible to participate in the Federal child nutrition programs.

(CACFP) After-School Snack Program and At-Risk Supper Program, the Summer Food Service Program (SFSP), and the Special Milk Program (SMP). These programs are designed to improve the nutritional quality of participating children’s diets. For NSLP and SBP, eligibility to participate for free or at a reduced price is based on family income or participation in other means-tested programs. In Fiscal Year 2016, NSLP provided lunch and after-school snacks to more than 30 million students each day in schools and residential child care institutions nationwide, while SBP provided breakfast to 14.6 million students each day in schools and residential child care institutions.²

This collection is necessary to provide up-to-date information about CN program operations in SY 2018-19 (Year 4 of the study). In addition, the Year 4 data and the information collected in Years 1 through 3 (SYs 2015-16 through 2017-18) will enable FNS to track participation in the CN programs and other key outcomes over time. Specifically, this study will provide the following:

- General descriptive data on the CN programs’ characteristics to help FNS respond to questions about the CN programs in schools
- Data related to program administration for designing and revising program regulations, managing resources, and updating reporting requirements
- Data related to program operations to help FNS develop and provide training and technical assistance for School Food Authorities (SFAs) and State Agencies (SAs) responsible for administering the CN programs

In summary, FNS uses these annual data to describe and assess program operations, provide input for legislation and regulations on the CN programs, and develop pertinent technical

² <https://www.fns.usda.gov/pd/child-nutrition-tables>.

assistance and training for program staff at the State and SFA levels. Conducting surveys at both the State and SFA levels is critical to obtain a full national picture of program operations.

Annual information is necessary for FNS to understand how recent and proposed legislation, regulations, policies, and initiatives change CN program operations. FNS also requires one-time snapshots of aspects of operations that are of special interest at a particular time. Therefore, CN-OPS-II surveys were designed as a set of data collection modules. Each module collects data on an aspect of the CN programs. The modules can be used annually, biennially, or once during the study period (for aspects of the CN programs that require just a one year snapshot). Such a data collection system enables FNS to respond more quickly and effectively to requests for policy-relevant analyses.

Included with this package are the research questions (Appendix A) and the survey instruments for Year 4 (Appendices C.1/C.2 and D.1/D.2). While there are no new survey modules for Year 4, some of the questions contained within the modules are new and some modules used in Year 3 were dropped.³ All new content in Year 4 has been pretested and burden estimated. FNS estimates that the average annual hour burden in Year 4 will be approximately 26 hours lower than the previously approved study burden, due to program changes described under Part A, Question 15.

Legal or Administrative Requirements. This study is necessary to implement Sec. 28(a)(1) of the Richard B. Russell National School Lunch Act (Appendix F.1). This legislation directs USDA to carry out annual national performance assessments of NSLP and SBP. Furthermore, the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law 111-296, Sec. 305) amended

³ All new and previously used questions are identified as such on the instruments in Appendices C.1 and D.1.

Section 28 of the Richard B. Russell National School Lunch Act by adding the following (Appendix F.2):

“(c) COOPERATION WITH PROGRAM RESEARCH AND EVALUATION.— States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts.”

A.2 Purpose and Use of the Information

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 is to be used. The surveys will collect information concerning the administration of Child Nutrition Programs at the State and local levels, practices that States and school districts (SFAs) use to operate Child Nutrition Programs, school and student participation in Child Nutrition Programs, and information concerning staffing and resources. The information will be used to answer the research questions presented in Appendix A in two ways. First, the information will be used to describe trends in the CN programs’ participation and operational practices, as well as aspects of operations in a single year. Second, the information will be used to assess how the CN programs’ participants are responding to recent legislative and policy changes. Statistics, specifically percentages and means, will be calculated from the responses to the survey questions. Percentages will be calculated for all multiple response questions, while means will be presented for financial responses including meal prices, revenues, and

expenditures. The statistics will be calculated using weighted data, so all results will provide national estimates. These estimates will provide information to help answer the research questions in Appendix A. Some research questions require descriptions of SFAs according to characteristics such as the FNS region, student enrollment (size), urbanicity, and percentage of students eligible for free or reduced price school meals. All statistics will be presented in tables and charts with associated text that explains how the estimates address each research question. The tables, charts, and associated text will be organized into final reports that will be made available to the public. Upon completion, interested individuals will be able to access the final report electronically on the USDA FNS website and browse all content areas.

FNS uses these annual data to describe and assess program operations, provide input for legislation and regulations on the CN programs, and develop pertinent technical assistance and training for program staff at the State and SFA levels.

From whom the information will be collected. The information is being collected from (1) a nationally representative sample of approximately 2,188 SFA Directors who administer the CN programs at the local level (1,750 SFA Directors are expected to respond) and (2) a census of the 55 State CN Directors who administer these CN programs at the State level (including the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, and American Samoa). While this is a voluntary survey, the selected SFA and CN Directors will be notified of the language in HHFKA (Public Law 111-296, Sec. 305) to encourage their cooperation in this data collection. There is no requirement to complete a survey in order to continue participation in the CN programs and/or to receive any Federal benefits.

How the information will be collected. The information will be collected through two web-based surveys: (1) the State Child Nutrition Director Survey (Appendix C.1; screenshots of the

web version available in Appendix C.2) and (2) the School Food Authority Director Survey (Appendix D.1; screenshots of the web version available in Appendix D.2). Accommodations will be made for Directors who prefer to complete the survey via either hard copy (regular mail) or by telephone (using the respondent’s unique web link to enter responses in either case⁴).

Table A-1. Overview of Data Collection Activities

Instrument	Respondents	Method of Collection	Length	Purpose	Frequency
State Child Nutrition Director Survey (Appendix C)	55 States and Territories	Web survey	2 hours	To describe State-level policies, practices, and needs related to CN programs.	Once
School Food Authority Director Survey (Appendix D)	1,750 SFAs	Web survey	2 hours	To describe district-level policies, practices, and needs related to CN programs	Once

The State CN Director Survey (Appendix C) will begin with an emailed invitation letter (Appendix B.1) requesting their participation in the study. The email will contain instructions on how to access the web survey, as well as information about the toll-free help line and email help desk. A PDF attachment of the survey instrument (Appendix C.1) will be included in the email for planning purposes. Help will be provided by a professional survey support specialist during regular business hours. Given the breadth and depth of information to be collected through these surveys, CN Directors will be able to share login information with associates who may be assigned to complete particular modules, and respondents may save their progress, facilitating completion of the survey in more than one session. Approximately 1 week after the mailing, the CN Initial Follow-up Email will be sent to the CN Directors who have not responded to the

⁴ No one asked to complete the survey by telephone in Year 3, although 34 returned hard-copy surveys. For Year 4, FNS anticipates that all of the survey responses will be received electronically.

invitation letter (Appendix B.2). A reminder email will be sent once every 2 weeks to the CN Directors who have not completed their survey (Appendix B.3). If the web survey is not completed within 7 weeks after the initial questionnaire is received, trained interviewers will call CN Directors and remind them to complete their survey using the CN Director Telephone Reminder script (Appendix B.4). The interviewers will offer assistance as needed. Director re-contact will occur in week 8 and data collection will stay open (until they respond or the end of the survey period, at which time all survey respondents will be mailed a thank-you letter (Appendix B.5). The data collection period for the CN Director Survey will span 9 weeks. If a respondent returns a completed hard copy of the survey, the responses will be entered into the database by a survey support specialist.

The SFA Director Survey (Appendix D.1/D.2) will begin with an email notification to all State CN Directors that the study team will soon contact the selected SFAs in their State (Appendix B.6). All sampled SFA Directors will be mailed an invitation letter (Appendix B.7) requesting their participation in the study. The mail package will include a copy of the School Food Authority Director Survey instrument (Appendix D.1) for planning purposes. The package will also contain instructions on how to access the web survey, as well as information about the dedicated toll-free help line and email help desk. As with the State CN Director Survey, help will be provided by a professional survey support specialist during regular business hours. Given the breadth and depth of information to be collected, SFA Directors will be able to share login information with individuals who may be assigned to complete particular modules, and respondents may save their progress, facilitating completion of the survey in more than one session. Approximately 1 week after the mailing, the SFA Initial Follow-up Email (Appendix B.8) will be sent to the SFA Directors who have not responded to the invitation letter. This

follow-up email will confirm that the package arrived and include information on accessing the survey and the telephone and email help desks. Reminder emails will be sent to the SFA Directors who have not completed their survey, every 2 to 3 weeks for 8 weeks (Appendix B.9). If the web survey is not completed within 8 weeks after the initial questionnaire is received, trained interviewers will call SFA Directors using the SFA Director Telephone Reminder scripts and remind them to complete their survey (Appendix B.10). The interviewers will offer assistance if needed and offer to complete any modules that the Director is ready to complete over the phone using the respondent's unique web survey link.⁵ Re-contact with those who have not yet submitted their surveys will occur throughout weeks 9 and 10. The data collection for the survey of SFA Directors will span 11 weeks, after which time a thank-you letter will be mailed to the respondents (Appendix B.11).

Frequency of information collected. Data collection with State CN Directors and sampled SFAs will occur once during SY 2018-19.

Information shared with any other organizations inside or outside USDA or the government. As in most FNS data collection efforts, data files and documentation will be prepared for restricted-use files (for researchers who agree to specific restrictions), and for public-use files (with some masking of data that could identify individual respondents). All results will be presented in aggregated form in the final report, which will be made publicly available in the research section of the USDA FNS website,

<http://www.fns.usda.gov/ops/research-and-analysis>.

⁵ This is offered only if the respondent asks or if there is a need to accommodate a lack of internet access or skills.

A.3 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. The surveys of the CN and SFA Directors will be web surveys and participants will be recruited by emails with embedded links to ease login to the survey system. Respondents who do not complete the web survey within the first several of the data collection period will be contacted by telephone and offered the opportunity to complete their survey over the phone using their unique web links to enter responses. Thus, all of the State CN Director and SFA Director surveys are expected to be completed electronically. Out of a total of 12,337 responses for this study, FNS estimates that 1,805 responses (15 %) will be submitted electronically.

A.4 Efforts to Identify Duplication and Use of Similar Information

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 has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. Some questions in the survey have been drawn and modified from prior FNS studies to collect updated information because the prior information is obsolete. To our knowledge, there is no similar information available or being collected for the planned timeframe.

A.5 Impact on 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.

Information being requested has been held to the minimum required for the intended use.

Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same functions as other SFAs. Thus, they maintain the same kinds of information on file. FNS estimates that out of the total 2,248 respondents for this collection, one percent of respondents are small entities, which is equivalent to approximately 23 respondents per year.

A.6 Consequence 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 proposed data collection plan calls for data collection from SFA Directors and CN Directors once during the school year. Gathering such data is essential to track the characteristics of the CN programs at the State and local levels. Ongoing changes to the programs are accompanied by parallel changes in administrative and operational processes. Collecting the information less frequently would obstruct FNS's ability to keep abreast of the issues in administration and operation of these programs, thereby delaying the discussion, formulation, and implementation of suitable policies.

A.7 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. This collection of information is conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 5 CFR 1320.5.

A.8 Comments in Response to Federal Register Notice and Efforts to Consult Outside 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.

Notice of this study was published in the *Federal Register* (Volume 83, Number 114, Pages 27538-27541) on June 13, 2018, specifying a 60-day comment period ending August 13, 2018.

One relevant comment was received requesting that FNS work to minimize the burden on school district personnel, be proactive in providing electronic resources to selected districts, and ensure that questions are phrased clearly and concisely in order to minimize burden and provide valuable data. FNS responded, noting that the surveys will be conducted electronically to minimize burden and facilitate ease of use, technical assistance will be available via email and phone, and that the surveys were pretested to obtain feedback on the phrasing and structure of

survey items. This comment and the FNS response are provided in Appendices E.1 and E.2, respectively.

Consultations Outside the Agency

In addition to soliciting comments from the public and affected stakeholders, FNS consulted with Jennifer Rhorer from National Agricultural Statistics Service (NASS) for expert consultation on the study design and methodology. NASS comments and the FNS response to NASS comments are available in Appendices E.3 and E.4, respectively.

School nutrition experts consulted about this study include the two State CN Directors who participated in the study pre-test. With their permission, their names and contact information are listed below:

Lynn Harvey, Ed.D., RDN, LDN, FAND,
SNS
Chief, School Nutrition Services
North Carolina Department of Public
Instruction
Lynn.Harvey@dpi.nc.gov
(O) 919.807.3506

Vonda Cooke M.S., R.D.
State Director, Child Nutrition Programs
Division of Food and Nutrition
vcooke@pa.gov
(O) 717-783-6556

A.9 Explanation of Any Payment or Gift to Respondents

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

No payment or gift will be provided to respondents.

A.10 Assurance 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.

FNS complies with the Privacy Act of 1974. No confidential information will be requested, reported, or maintained as a result of the data collection activities. The State CN Directors will

be informed that their personal information (name, telephone number, etc.) will be kept private, but that their responses about agency operations may be tabulated by State (see Appendix B.1). The SFA Directors will be informed that their personal information will be kept private and that their responses will only be reported in aggregated form (see Appendix B.7). To ensure that personal information remains private, the study team is required to create and keep data on secure networks and utilize data collectors who sign nondisclosure agreements (Appendix G) binding them to protect private information. Names and contact information will not be linked to participants' responses; survey respondents will be assigned a unique ID number, and analysis will be conducted on datasets that include only respondent ID numbers. While FNS will maintain a separate file that links the unique ID numbers with respondent contact information, that file will be kept private and will not be made available for public use. All public-use data will be de-identified or masked to protect respondent privacy. All data will be securely transmitted to the study team via secure networks, mail, or telephone and will be stored in locked file cabinets or on password-protected computers and accessible only to study team staff. Once the contract has ended, members of the study team will destroy all files containing private information.

FNS published a system of record notice 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. Neither the surveys nor the other data collection materials in this collection require a Privacy Act Statement.

A.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.

There are no questions of a sensitive nature included in this information collection.

A.12 Estimates of Annualized Burden Hours and Costs

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.**

This is a revision of a currently approved collection. With this submission, there are 2,248 respondents (1,810 respondents and 438 non-respondents), 12,337 responses, and 4,073 burden hours (3,822.37 for respondents and 250.57 for non-respondents). The average number of responses per respondent is 3.03 and the average number of responses per non-respondent is 15.66. Table A.2 and Appendix H show the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials, affected stakeholders, and prior experience in collecting similar data.

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

Table A.2 and Appendix H also show the estimated annualized cost to respondents. The estimates of annualized costs to State and local governments are based on the burden estimates and utilize the U.S. Department of Labor, Bureau of Labor Statistics, May 2017 National Occupational and Wage Statistics for Occupational Groups 999200: State Government (https://www.bls.gov/oes/current/naics4_999200.htm) and 611000: Elementary and Secondary Schools (http://www.bls.gov/oes/current/naics4_611100.htm). Annualized costs are based on the mean hourly wage for each job category. The estimated annualized cost for State government, which includes State CN directors (Occupation Code 11-9030, Education Administrators), is

\$5,781.76 (\$44.89/hr. x 128,80 hours). The estimated cost of this data collection for local government, which includes SFA directors (Occupation Code 11-9039, Education Administrators, All Other), is \$183,165.55 (\$46.44/hr. x 3,944.13 hours).⁶ Including an additional \$62,352.61 to account for a fully loaded wage rate (\$188,947.31 x 0.33), the estimated annualized total cost to respondents associated with this collection is \$251,299.92.

⁶ Due to rounding, the estimates listed here differ slightly from those included in the burden table.

Table A-2. Annualized Burden and Cost of CN-OPS II Year 4

	Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive						Non-Responsive					All		
					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	Hourly wage rate	Total Burden (in \$)	
State / Local Government	State CN Directors	Hard copy pre-test	—	2	2	1	2	3	6	0	0	0	0.50	0.00	6.00	\$ 44.89	\$ 269.34	
		State Child Nutrition Director Survey	C.1/C.2	55	55	1	55	2	110	0	0	0	0.08	0.00	110.00	\$ 44.89	\$ 4,937.90	
		CN Invitation Letter	B.1	55	22	1	22	0.05	1.1	33	1	33	0.03	1.10	2.20	\$ 44.89	\$ 98.76	
		CN Initial Follow-up Email*	B.2	33	13	1	13	0.05	0.65	20	1	20	0.03	0.67	1.32	\$ 44.89	\$ 59.11	
		CN Reminder Email - Week 2*	B.3	20	8	1	8	0.05	0.4	12	1	12	0.03	0.40	0.80	\$ 44.89	\$ 35.91	
		CN Reminder Email - Week 4*	B.3	12	5	1	5	0.05	0.25	7	1	7	0.03	0.23	0.48	\$ 44.89	\$ 21.70	
		CN Reminder Email - Week 6*	B.3	7	3	1	3	0.05	0.15	4	1	4	0.03	0.13	0.28	\$ 44.89	\$ 12.72	
		CN Director Telephone Reminder - Week 7*	B.4	4	2	1	2	0.083	0.167	2	1	2	0.03	0.07	0.23	\$ 44.89	\$ 10.47	
		CN Director Telephone Reminder - Week 8*	B.4	2	2	1	2	0.083	0.167	0	0	0	0.03	0.00	0.17	\$ 44.89	\$ 7.48	
		CN Director Thank You Letter	B.5	55	55	1	55	0.05	2.75	0	0	0	0.03	0.00	2.75	\$ 44.89	\$ 123.45	
	Email Notification from States to SFAs	B.6	55	55	1	55	0.083	4.565	0	0	0	0.03	0	4.57	\$ 44.89	\$ 204.92		
	Local SFA Directors	Hard copy pre-test	—	5	5	1	5	3	15	0	0	0	0.05	0	15.00	\$ 46.44	\$ 696.60	
		School Food Authority Director Survey	D.1/D.2	2,188	1,750	1	1,750	2	3,500	438	1	438	0.083	36.50	3,536.50	\$ 46.44	\$ 164,235.06	
		SFA Invitation Letter	B.7	2,188	656	1	656	0.05	32.80	1,532	1	1,532	0.03	51.07	83.87	\$ 46.44	\$ 3,894.77	
		SFA Initial Follow-up email**	B.8	1,532	383	1	383	0.05	19.15	1,149	1	1,149	0.03	38.30	57.45	\$ 46.44	\$ 2,667.98	
		SFA Director Reminder Email - Week 2**	B.9	1,149	287	1	287	0.05	14.35	862	1	862	0.03	28.73	43.08	\$ 46.44	\$ 2,000.79	
		SFA Director Reminder Email - Week 5**	B.9	862	129	1	129	0.05	6.45	733	1	733	0.03	24.43	30.88	\$ 46.44	\$ 1,434.22	
		SFA Director Reminder Email - Week 7**	B.9	733	110	1	110	0.05	5.50	623	1	623	0.03	20.77	26.27	\$ 46.44	\$ 1,219.82	
		SFA Director Telephone Reminder - Week 8**	B.10	623	93	1	93	0.083	7.75	530	1	530	0.03	17.67	25.42	\$ 46.44	\$ 1,180.35	
SFA Director Telephone Reminder - Week 9**		B.10	530	53	1	53	0.083	4.42	477	1	477	0.03	15.90	20.32	\$ 46.44	\$ 943.51		
SFA Director Telephone Reminder - Week 10**	B.10	477	39	1	39	0.083	3.25	438	1	438	0.03	14.60	17.85	\$ 46.44	\$ 828.95			
SFA Thank You Letter	B.11	1,750	1,750	1	1,750	0.05	87.50	0	0	0	0.03	0.00	87.50	\$ 46.44	\$ 4,063.50			
TOTAL REPORTING BURDEN (State & Local Government)				2,248	1,810	3.03	5,477	0.698	3,822.37	438	15.66	6,860	0.037	250.57	4,072.93		\$ 188,947.31	
																.33% to Account for Fully Loaded Wage Rate		\$ 62,352.61
TOTAL REPORTING BURDEN (Fully Loaded)																	\$ 251,299.92	

A.13 Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

A.14 Annualized Cost to the Federal Government

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

The total annualized cost to the Federal Government is \$636,612.15. The largest cost to the Federal Government is to pay a contractor \$3,050,669.92 over a period of 60 months (June 2015 to June 2020) to conduct the study and deliver data files and reports. This represents an average annualized cost of \$610,133.98, including labor and other direct and indirect costs. The annualized cost of this information collection also assumes a total of 400 hours annually of Federal employee time: for a GS-12, step 5 at \$44.28 per hour for a total of \$17,712. In addition, we assume 40 hours annually for the Branch Chief, at GS-14, Step 1, at \$54.91 per hour for a total annual cost of \$2,196.40. Adding in \$6,569.77 to account for fully loaded wages (\$19,908.40 x 0.33), total Federal employee costs per year are thus estimated at \$26,478.17. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2019 for the Washington, DC locality.⁷

⁷ Office of Personnel Management. (2019). *Salary table 2019-GS*. Retrieved from https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB_h.pdf

A.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 83-1.

This is a revision of a currently approved data collection (OMB Number 0584-0607; expiration 07/31/2020). This information collection is currently approved with 4,099 burden hours and 12,339 responses. As a result of this revision, FNS estimates that the burden for this collection will decrease by an approximate total of 26 hours due to program changes. FNS estimates that 3 burden hours will be eliminated because there was one fewer pretest participant for the Year 4 SFA Director survey and one fewer pretest non-respondent for the Year 4 State CN Director Survey than there was in Year 3 (in Year 3 there were 6 pre-test participants for the SFA Director survey and 2 respondents (with 1 non-respondent) for the CN Director Survey). For this same reason, the total number of responses has decreased by two. FNS made the decision to move forward with fewer pretest participants in the interest of time and our assessment that the selected participants would provide sufficient feedback without needing to recruit additional respondents. Additionally, FNS decreased the burden associated with Appendix B.6 State Email Notification of Selected SFAs from 30 minutes to 5 minutes per respondent because we are now able to get SFA director contact information from other data and do not need States to provide it. FNS estimates that this will reduce the burden by 23 hours. With this revision, FNS estimates that this information collection will have 4,073 burden hours and 12,337 responses.

A.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.

Table A-3. Data Collection Schedule—Year 4

Activity	Dates
Recruitment of States and SFAs	Starting 1 week post-OMB approval
Data Collection (SFA Survey and CN Director Survey)	Starting 2 weeks post-OMB approval and lasting 13 weeks
Data File Preparation (restricted and public use)	Starting 4 months after OMB approval
Data Analysis and Reporting	Starting 5 months post-OMB approval
Dissemination and Publication of Findings	March – May 2020

a. Plans for Tabulation of the Survey Data

The analysis of the Year 4 data will provide a snapshot of the CN programs’ characteristics and operations. Descriptive statistics including frequency distributions and cross-tabulations will be generated to address each research question; as appropriate for the research questions, analyses will be presented by school type, SFA size, poverty level, FNS Region, and other characteristics.

The data from the SFA Director Survey will be weighted to produce nationally representative estimates of the population of SFAs at the time of the data collection (SY 2018–19). Information on SFAs from the FNS National Data Bank and the National Center for Education Statistics’ Common Core of Data will be used to adjust the weights to minimize nonresponse bias if necessary.

b. Plans for Publication

Study findings will be synthesized and published in a final report, which will be posted on the FNS website.

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

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 OMB approval number and expiration date on all instruments.

A.18 Exceptions to Certification for Paperwork Reduction Act Submission

Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

FNS is able to certify compliance with all provisions under Item 19 of OMB form 83-I.