

**School Nutrition and Meal
Cost Study-II (SNMCS-II)**

**OMB Supporting Statement
Part A**

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PART A. JUSTIFICATION

A.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.

The school meal programs administered by the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) are a cornerstone of the nation’s nutrition safety net for low-income children. FNS has long been committed to ensuring that the meals provided in schools are healthful and contribute to children’s dietary requirements. The second School Nutrition and Meal Cost Study (SNMCS-II) continues the long-standing commitment of FNS to periodically assess the National School Lunch Program (NSLP) and School Breakfast Program (SBP), known collectively as the school meal programs, and will provide a comprehensive picture of the school meal programs in school year (SY) 2019–2020.

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) mandated substantial changes to the nutrition standards for school meals. These changes were implemented beginning in SY 2012–2013. The goal of the updated standards was to increase the alignment of school meals with the *Dietary Guidelines for Americans* and current information about the nutrient requirements of school-age children (Institute of Medicine 2010).¹ Key reforms stemming from this legislation included new, more stringent meal pattern and nutrient requirements for school meals, new offer-versus-serve rules, gradually increased prices for paid meals, and the introduction of

¹ Now the National Academy of Medicine.

nutrition standards for competitive foods. The first School Nutrition and Meal Cost Study (SNMCS-I; OMB Control Number 0584-0596, Discontinued 07/31/2017) provided information about how school food authorities (SFAs) and schools implemented the reforms and how these reforms affected the school meal programs.

With this second School Nutrition and Meal Cost Study, FNS intends to update the information from SNMCS-I, as well as examine the costs of producing school meals in certain States and Territories that were not part of SNMCS-I. SNMCS-II contains two sub-studies. The first sub-study, referred to as the “mainland study,” will provide a comprehensive picture of the school meal programs in SY 2019–2020 and will provide critical information about the nutritional quality, cost, and acceptability of school meals seven years after major reforms began being phased in during SY 2012–2013. The mainland study will collect a broad range of data from nationally representative samples of public SFAs; public, non-charter schools; students; and parents/guardians² in the contiguous United States, including the District of Columbia (DC). These data will provide Federal, State, and local policymakers with current information about how federally sponsored school meal programs are operating by updating the information that was collected in SY 2014–2015 for SNMCS-I. In addition, findings from the SNMCS-II mainland study will be compared to those from SNMCS-I to explore trends in key domains, including the nutrient content of school meals, meal costs and revenues, and student participation, plate waste, and dietary intakes. The

² We generically refer to *parents* for discussion purposes, recognizing that responding individuals might actually be legal guardians or other caregivers who are the most familiar with what students eat outside of school.

second sub-study, referred to as the “outlying areas cost study,” or OACS, will only estimate the costs of producing reimbursable school meals in Alaska, Guam, Hawaii, Puerto Rico, and the United States Virgin Islands (USVI), and examine the relationship of costs to revenues in these States and Territories.

Section 28(a) of the Richard B. Russell National School Lunch Act (Appendix A) authorizes the USDA Secretary to conduct performance assessments of the school meal programs, including the nutritional quality of the meals and the costs of producing them. Section 28(c) requires “States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs” authorized under the National School Lunch Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) to cooperate with program research and evaluation being conducted on behalf of the USDA Secretary under those Acts.

A.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.

This is a new information collection request. The mainland study will collect a broad range of data from nationally representative samples of public SFAs, schools, students, and parents during SY 2019–2020 in the 48 contiguous States and DC (Figure A.2). These data will provide needed information about how federally sponsored school meal programs are operating seven years after implementation of major reforms, including new nutrition standards that went into effect in SY 2012–2013 and more recent changes that will be in effect during SY 2019–2020.

The mainland study will address numerous research questions under four broad study objectives of interest to USDA, the States, SFAs, and other program stakeholders:

1. Describe the SFA and school environment, food service operating policies and practices, student participation, and other characteristics of schools and SFAs participating in the NSLP and SBP.
2. Determine the food and nutrient content of school meals and afterschool snacks and the overall nutritional quality of these meals and snacks.
3. Determine the cost to produce reimbursable school lunches and breakfasts, including indirect and local administrative costs, and examine the ratios of revenues to costs.
4. Describe student characteristics, participation, student/parent satisfaction, plate waste, and students' dietary intakes.

In addition to providing nationally representative findings on the NSLP and SBP within these four broad topic areas, findings from the SNMCS-II mainland study will be compared to findings from SNMCS-I to explore trends in food service operations, the nutrient content of school meals, meal costs and revenues, and student participation, plate waste, and dietary intakes. The study will also examine relationships among the key domains, especially among nutritional quality, cost, and student participation.

The outlying areas cost study (OACS), a sub-study within SNMCS-II, will collect a narrower range of data. In the OACS, States and Territories will participate in data collection that involves representative samples of public schools, or in a more limited data collection that involves representative samples of public SFAs. These two approaches to data collection are referred to as the “full” and the “limited” data collections, respectively. Alaska, Guam, and Hawaii will complete the full data collection during SY 2019-2020.

USVI will complete either the full or limited data collection during SY 2019-2020. Puerto Rico will complete two rounds of data collection—the limited data collection during SY 2019-2020, followed by the full data collection during SY 2020-2021 or SY 2021-2022.³ Both the full and limited data collections in the OACS will be restricted to data needed to determine the cost to produce reimbursable school lunches and breakfasts, and examine the ratios of revenues to costs, in each outlying area. Therefore, even the full data collection in the outlying areas is not as burdensome as the mainland data collection. All data collection in the outlying areas will be completed without any visits to SFAs and schools, whereas some of the cost-related data in the mainland study will be collected on-site.

Participation in the data collection is voluntary and is not required for States, SFAs, schools, or individuals to obtain benefits. Data collection from States, SFAs, and schools are not part of an audit, and student and parent participation has no effect on services or benefits they may receive or apply for in the future. This is a one-time data collection, except in Puerto Rico, which may participate in both the limited and full OACS, as discussed in

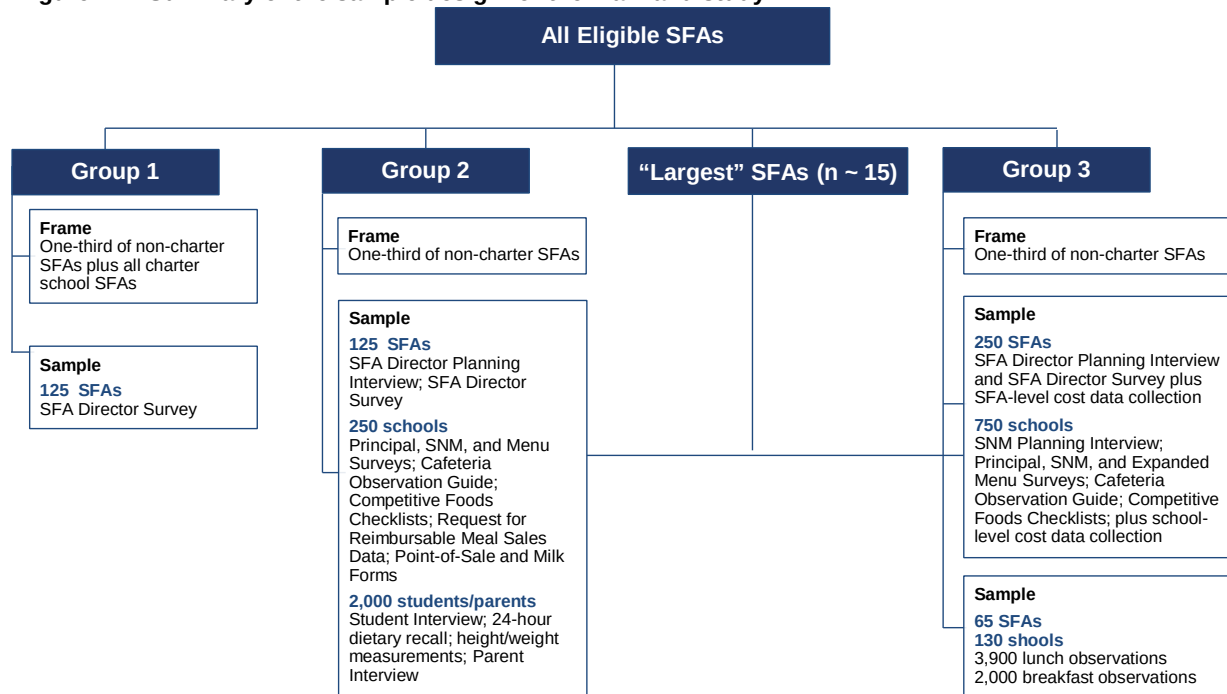
³ Data collection plans for the States and Territories included in the OACS are based on findings from a feasibility assessment completed in 2018 (OMB Control Number 0584-0606, Expires 4/30/2019). This assessment was inconclusive about the feasibility of the full data collection in Puerto Rico and USVI. For this reason, a second feasibility assessment will be conducted in these two Territories in spring 2019, also under OMB Control Number 0584-0606. Findings from the reassessment will determine whether the limited or full data collection is feasible in either Territory. We do not anticipate any changes to the instruments or estimated burden for the limited or full data collections in Puerto Rico or USVI because the plans for the limited data collection were informed by findings from the first feasibility assessment. If the full data collection is found to be feasible in Puerto Rico, the feasibility reassessment will also determine the timing of the full data collection. We assume in this ICR for SNMCS-II that USVI will participate in the full data collection, but the contact materials prepared for the limited data collection are designed to accommodate USVI if needed. In the unlikely event that the instruments or estimated burden for Puerto Rico or USVI must be changed, we will submit the changes to OMB to review.

Section A.6. FNS will share publicly the reports generated from SNMCS-II on its website.

On behalf of FNS, the information for SNMCS-II will be collected and analyzed by Mathematica Policy Research and its subcontractors, Insight Policy Research, Decision Information Resources (DIR), Agralytica, and Relyon Solutions, the small business that developed one of the instruments of the study—the Electronic Menu Survey (EMS). The table in Appendix B summarizes the data collection plan for the mainland study and the OACS by study objective (mainland study only), respondent, target number of completed interviews, mode, estimated burden, target response rate, and starting sample size.

The mainland study sample is divided into three groups with different data collection activities. The Group 1 sample consists of SFAs and no schools; the Group 2 sample consists of SFAs, schools, and students and their parents; and the Group 3 sample consists of SFAs, schools, and breakfast and lunch trays. The OACS sample includes SFAs and schools in Alaska, Guam, Hawaii, Puerto Rico, and USVI.

Figure A.2. Summary of the sample design for the mainland study



Notes: The sampling frame for the mainland study includes SFAs serving public schools in the contiguous United States and the District of Columbia. SFAs serving only institutional populations or operated by States or the Federal government are excluded. Sample sizes reflect target completed sample sizes.

A.2.1. Recruitment

Recruiting procedures are similar in the mainland study and in both the full and limited data collections in the OACS, but the recruiting materials are different. This section first describes procedures for the mainland study, followed by the full and limited data collections in the OACS. An Institutional Review Board (IRB) approved the study procedures and instruments (Appendix C1).

A.2.1.1 Mainland study

First, we will notify the seven FNS Regional Offices (ROs) of the study (Appendix C2.1), and include an overview of the study objectives (Appendix C2.2). Then, we will email State Child Nutrition (CN) agencies (Appendix C3) and copy RO staff to describe the study, the schedule for recruitment and

data collection, and the information to be collected. We will attach copies of the study objectives (Appendix C2.2) and the list of main and replacement sampled SFAs and schools in the State and request that they provide contact information for the SFA directors and information about SFA and school characteristics. We will also include a sample SFA notification email that States can send to SFAs selected into Groups 2 or 3 (Appendix C4), apprising them of the study. For instances in which the State/Territory has identified that a food service management company (FSMC) manages school meals, we will contact the FSMCs to obtain their endorsement for the study before recruiting SFAs. FSMCs will first receive a study letter (Appendix C5), endorsement letter from the School Nutrition Association (Appendix C6), and a study overview (Appendices C7 and C8). Then, contractor staff will call the FSMCs to obtain their endorsement (Appendix C9).

Sampled SFAs in Groups 2 and 3 will then be recruited to participate in the data collection.⁴ These SFAs will receive an initial mailing, which includes an introductory letter from FNS (Appendix C10), letter of endorsement from the School Nutrition Association (Appendix C6), a study overview tailored to their sample group (Appendices C7 and C8), and a list of sampled schools. Trained recruiters will call SFAs to describe the study in more detail and the role of SFAs in the data collection (Appendix C11). SFA directors who agree to participate will complete a brief SFA Director Planning Interview by telephone (Appendix C12) to provide key information about the SFA and the schools sampled for data collection. Responses to the SFA Director Planning

⁴ SFAs in Group 1 will not be formally recruited into the study, as they will only be asked to complete the SFA Director Survey, further described in Appendix K1.

Interview will also determine which Group 3 SFAs and schools are eligible for plate waste observations (further described in Appendix K1).

After the SFA Director Planning Interview is completed, we will email the SFA director a summary of the data collection plans (Appendix C13). The summary will specify dates of data collection and confirm contact information for principals and school nutrition managers (SNMs) of sampled schools. For Group 3 SFAs, a description of data collection activities and respondents will also accompany the email (Appendix C14). Following recruitment of the SFA, we will email letters about the study to principals (Appendix C15) and SNMs (Appendix C16), as well as the study overview tailored to their sample group (Appendices C7 and C8). We will then follow up with the school principal to confirm the school visit and, for Group 2 schools, identify a school liaison to facilitate student-level data collection and outline next steps (Appendix C17). After they have been notified of the study, SNMs in Group 3 schools will be invited to complete a School Planning Interview on the web (Appendix C18), providing information needed to plan for on-site data collection. Approximately two weeks before in-person visits, all named contacts in Groups 2 and 3 SFAs will get a pre-visit reminder email to confirm the visit, which will also include important data collection reminders (Appendix C19). All of the recruitment calls and interviews described above will be completed by contractor staff.

Student-level data collection will occur in all Group 2 schools. Recruitment of students and parents will initially be coordinated through the districts, to streamline the process and establish a consistent approach

across the districts' sampled schools. We will obtain student rosters to use in selecting the sample; when feasible, we will obtain these rosters at the district level (Appendix D1). Otherwise, we will request the rosters directly from school liaisons. We will ask for rosters to be returned within two weeks after request, to allow sufficient time to ensure that the roster is complete, draw the sample of students, distribute consent materials to parents, and receive consent/non-consent before data collection. In many cases, we expect that SFAs and schools will be able to extract the roster data from an existing database within this timeframe, but will also work with respondents to accommodate longer timelines if needed. The liaisons will also be asked to complete a School Planning Interview on the web (Appendix C18), providing information needed to plan for on-site data collection.

We will contact designated school liaisons for Group 2 before any direct outreach to parents and students. As authorized under the statutory exception at 20 U.S.C. 1232g(b)(1)(K), we will request contact information and key demographic information on the rosters to monitor whether the completed sample is representative of the student universe from which it was drawn. School liaisons will assist with the distribution of study materials to the parents of selected students to recruit them into the study. We will ask school liaisons for guidance on the most effective means of communicating with selected parents and students—whether by direct mail or through the liaison handing out the study materials in person. We will provide schools with a sample endorsement letter (in English and Spanish) and ask them to share the information about the study broadly with all families through the

school's usual communication channels (Appendices D2 and D3). For sampled students, we will typically mail to each selected household a consent packet that includes an invitation letter (Appendices D4 and D5); a study brochure tailored to parents, with answers to frequently asked questions (Appendices D6 and D7); and the endorsement letter signed by a school or district administrator (Appendices D2 and D3). Contact materials include a toll-free telephone number that parents can call to obtain further information. The packet will also include parental consent (Appendices D8, D9, D10, and D11) and child assent forms (Appendices D12 and D13) and postage-paid return envelopes. The parent contact materials as well as consent and assent forms will be available in English and Spanish. We plan to use a consent process that provides parents and students the opportunity to decline to participate.⁵ Parents or students who do not wish to participate can return their signed forms in postage-paid return envelope addressed to Mathematica. This opt-out approach, used successfully in SNMCS-I and authorized under a statutory exception at 20 U.S.C. 1232g(b)(1)(K) will yield the largest proportion of participating sample members while still protecting human subjects' rights.

When active consent (in which the parent or guardian provides permission for the minor to participate in the study) is required by the school district, we will ask the liaison to assist in the consent return process by following up with parents directly or providing updated contact information

⁵ Generally speaking, fewer people opt out of opportunities than opt in. Therefore the risk of nonresponse bias is lower with the planned approach because a smaller share of the sample will opt out. Weights will be constructed to adjust for differences between study participants and nonparticipants.

for reaching the parent directly. We will also provide postage-paid return envelopes, for parents to mail back signed hard-copy forms, and will digitally record verbal consents in districts that allow it.

Most data will be collected from January to June 2020. This timing will condense collection of the data used to estimate student dietary intakes and the nutrient content and cost of school meals to as narrow a period as possible and will provide consistency with the data collection period in SNMCS-I. Following OMB approval, SFA Director and School Planning Interviews will be conducted in conjunction with SFA and school recruiting through approximately February or March 2020. Group 3 and OACS SFAs will complete follow-up interviews to collect final, audited data on costs and revenues for SY 2019–2020 in the fall and winter of SY 2020–2021.

A.2.1.2 OACS full data collection

When we notify ROs about the mainland study, we will also include, for relevant ROs, an overview of the OACS full data collection (Appendix C20). We will then email State CN agencies to describe the study, schedule, and procedures, and to request information about the sampled SFAs and schools (Appendix C21). We will attach a copy of the study overview (Appendix C20) and the list of sampled SFAs and schools, and request that they provide contact information for the SFA directors and information about SFA and school characteristics. We will also include a sample SFA notification email that States/Territories can send to sampled SFAs (Appendix C22).

After States have been contacted for the mainland study and the OACS, we will then recruit sampled SFAs following the procedures described above

for the mainland study. First, we will send an introductory letter from FNS (Appendix C23), the School Nutrition Association endorsement letter (Alaska and Hawaii only; Appendix C6), study overview (Appendix C20), and a list of sampled schools. Recruiters will then follow up by telephone (Appendix C11). SFA directors who agree to participate will complete the SFA Director Planning Interview (Appendix C12). Then, we will send the SFA director a post-planning email summarizing the data collection (Appendix C24), including a list of the specific data collection activities and respondents (Appendix C14). Guam's SFA contracts with an FSMC, whose staff will be asked to provide data for the OACS full data collection (described in Section A.2.2.2). Thus, after recruiting the SFA in Guam, we will send the Guam FSMC a study overview and recruitment letter (Appendices C20 and C23). When we contact this FSMC, as described in Section A.2.1.1 for the mainland study, we will include the overview of the OACS (Appendix C20) with the mainland study materials. In the subsequent recruitment call to the FSMC (Appendix C9), we will also describe the activities included in the full data collection. This is because in Guam, FSMC managers will be asked to provide data for the OACS full data collection, in addition to the data that SFA and school staff will provide for the full data collection (described below). Thus, a trained recruiter will call the FSMC manager overseeing Guam's SFA to describe the study in more detail and the role of FSMC in the data collection (Appendix C11). Based on the findings from the outlying areas feasibility assessment, which was approved by OMB on March 19, 2018 under OMB Control Number 0584-0606 FNS Generic Clearance for Pre-testing, Pilot, and Field Test

Studies, none of the other States or Territories included in the OACS have a contract with an FSMC.

After SFAs are recruited, we will contact schools by sending introductory letters to principals (Appendix C25) and SNMs (Appendix C26), and enclose the study overview (Appendix C20). We will then follow up with the school principal and SNM to confirm the target week, and ask SNMs a small number of questions from the School Planning Interview about working hours and internet connectivity (Appendix C18). All named contacts in each SFA will get a reminder email to confirm the scheduled data collection activities (Appendix C27).

In Alaska, Guam, and Hawaii, and USVI if the full data collection is feasible in the Territory, data will be collected on the same schedule as the mainland study. In Puerto Rico, data collection for the full data collection will occur primarily in spring 2021 or 2022, and the follow-up interviews to collect final, audited data on costs and revenues will be collected in fall/winter 2021 or 2022.

A.2.1.3 OACS limited data collection

The outreach procedures to the Mid-Atlantic Regional Office and Territories for the OACS limited data collection will be the same as those described in Section A.2.1.2 for the OACS full data collection. No FSMCs are involved in the limited data collection. We will recruit SFAs following procedures similar to those described above for the OACS full data collection. The following outreach steps will occur for the limited data collection:

- Send an email to State CN agencies to request information about the sampled SFAs (Appendix C21), including study objectives

(Appendix C20) and sample SFA director notification (Appendix C22).

- Send an introductory letter from FNS to SFA directors (Appendix C23), including the study overview (Appendix C20).
- Conduct follow up telephone calls to SFA directors and superintendents (Appendix C11).
- Complete the SFA Director Planning Interview with the SFA director (Appendix C12), and send the SFA director a summary of the data collection in a post-planning email (Appendix C24) with a document describing specific activities and respondents (Appendix C14).
- Send a reminder email to SFA directors to confirm the scheduled interview (Appendix C27).⁶

Data collection for the limited approach will occur on the same schedule as the mainland study. Specifically, most data will be collected in spring 2020, and the follow-up interviews to collect final, audited data on costs and revenues will be conducted in fall 2020.

A.2.2. Data collection plans

The data collection plans for the mainland study mirror those from SNMCS-I and include:

- Menu Survey with SNMs (Appendices E1 and E2)⁷
- SFA Director, Principal, and SNM Surveys (Appendices F1-F9)
- Cost study data collection (Appendices G1-G14)⁸
- Competitive Foods Checklists and Cafeteria Observation Guide (Appendices H1 and H2)
- Student and parent data collection (Appendices I1-I15)

⁶ A user-friendly reference guide (Appendix G8) will be included with the reminder, and is discussed further in Section A.2.2.2.

⁷ The Basic and Extended Menu Surveys will be administered as booklets and the burden shown on the first page of the booklets includes all of the forms that are included in that booklet.

⁸ The burden associated with Appendix G9 (School Nutrition Manager Cost Interview Reference Guide) is included in the burden disclosure statement on Appendix G4 (School Nutrition Manager Cost Interview) since these will be administered together. Similarly, the burden associated with Appendix G10 (Principal Cost Interview Reference Guide) is included in the burden disclosure statement on Appendix G5 (Principal Cost Interview). The burden associated with Appendix G14 (SFA Follow-up Cost Interview Reference Guide) is included in the burden disclosure statements on Appendix G13 (SFA Follow-up Cost Interview).

- Plate waste observations (Appendix J1)
- Reimbursable Meal Sale Data Request (Appendix J2)

The data collection plans from SNMCS-I were previously approved by OMB (OMB Control Number 0584-0596, Discontinued 07/31/2017), and therefore are described in further detail in Appendix K1. Appendices K2 through K8 include example screenshots for each of the web-based instruments. Screen shots of the full instruments will be submitted to OMB once they are available. In the sections that follow, we discuss plans for the OACS full and limited data collection, which are new to SNMCS-II. Pretesting in Puerto Rico in April of 2019 (OMB# 0584-0606 FNS Generic Clearance for Pre-Testing, Pilot, and Field Test Studies, expiration date 6/30/2022) indicated the need for all instruments to be in Spanish. Translations are currently in progress and will be submitted to OMB once finalized.

A.2.2.1 Menu Survey

The Menu Survey collects data required to estimate food costs for the OACS. SNMs in OACS schools in the full data collection will be asked to complete a Menu Survey for one school week (referred to as the “target week”). OACS respondents in the full data collection will complete a subset of the Expanded Menu Survey components (Appendices E2.2)⁹ to collect the information needed to estimate the cost of producing school lunches and breakfasts. SFA directors in OACS SFAs in the limited data collection will also be asked to complete a modified version of the Menu Survey for one school week. They will complete adapted versions of three forms in the Expanded

⁹ The example completed forms in Appendix E2 reflect information that will be provided in Group 3. Some of these data will not be requested of OACS respondents. Appendices E2.1 and E2.2 contain the specific forms that apply to them.

Menu Survey: the Reimbursable Foods Forms for Lunch and Breakfast and the Recipe Forms (Appendix E2.2) based on one week of menus offered in the SFA. These forms will omit fields for the number of portions because the fields are not needed for the limited data collection.

We will administer the Menu Survey as a self-administered web instrument called the Electronic Menu Survey (EMS). Because of the small number of OACS respondents in the limited data collection who will complete adapted versions of three forms in the Expanded Menu Survey (Appendix E2.2), these respondents will be offered hard-copy forms only.

Technical assistance and data retrieval for the Menu Survey will be the same for the full data collection in the OACS as for the mainland study (Appendix K1). Highly trained technical assistants (TAs) will provide respondents with intensive support to ensure prompt completion of the Menu Survey and provision of complete and accurate data. After the target week, nutrition coders will review completed forms in the EMS and follow up with SNMs on critical missing data. Nutrition coders will also review hard-copy forms completed by SFA directors in the OACS limited data collection and follow up on critical missing data. Respondent time to provide these data is included in the burden estimates for the Menu Surveys, as the data retrieval is part of the process of searching existing data sources, gathering the data needed, and completing and reviewing the collection of information.

A.2.2.2 Cost study data collection

Staff in the OACS will participate in cost interviews and provide administrative data needed to estimate meal costs and school food service

revenues. Cost data collection in these samples will proceed in stages: (1) data collection before the target week, (2) remote data collection during the target week, and (3) follow-up data collection after the end of the school year. The OACS full and limited data collection activities differ. Below describes activities for the OACS full data collection sample, followed by activities for the OACS limited data collection.

Data collection before the target week. Concurrent with SFA recruitment, trained study staff will contact State Education and CN Agency finance officers to complete the State Agency Indirect Cost Survey (Appendix G1), using the same data collection plan for the mainland study described in Appendix K1, except that the study overview provided will be specific to the OACS (Appendix C20). This survey will be fielded to Alaska and Puerto Rico in the OACS full data collection. The survey will not be fielded to Guam, Hawaii, or USVI in the OACS full data collection because these States and Territories have only one or two SFAs. We will mail an invitation letter (Appendix G2) and study overview (Appendices C8 and C20) and the questionnaire to respondents.

Outlying areas full data collection during the target week. Trained interviewers will collect cost information in SFAs and schools in the OACS. To facilitate these interviews, we will send user-friendly reference guides (Appendices G8, G9, and G10)¹⁰ to the respondents prior to the target week. Specifically, interviewers will administer the SFA On-Site Cost Interview

¹⁰ For the Group 3 mainland study, the contents of these guides are referenced in the SFA On-Site Cost Interview (Appendix G3), SNM Cost Interview (Appendix G4), and Principal Cost Interview (Appendix G5), and will be used as handouts during in-person data collection.

(Appendix G3)¹¹, SNM Cost Interview (Appendix G4), and Principal Cost Interview (Appendix G5) over the telephone, using screen-sharing technology when feasible. Interviewers will use the Food Cost Worksheet (Appendix G6) to review for completeness the food price documents SFA directors were asked to compile and submit in advance (Appendix C27).

Because an FSMC operates the school meals program in the majority of Guam’s schools, data will be collected from FSMC staff as well as the Guam SFA staff to help estimate the cost of producing school meals, both including and excluding the FSMC operating profits. The FSMC staff will receive a reminder email prior to the target week (Appendix C27) as well as the appropriate reference guide for their interview (Appendices G8 and G9). Interviewers will administer a separate SFA On-Site Cost Interview (Appendix G3) and Food Cost Worksheet (Appendix G6) to the FSMC manager, and the four FSMC regional operations managers will assist SNMs in completing the SNM Cost Interview (Appendix G4).

As interviewers complete their data collection activities, they will note any missing or incomplete data collection components and follow up with respondents to complete their work. If interviewers cannot complete all the activities, study staff will continue to follow up after the target week to retrieve as much data as possible. Respondent time to provide these data is included in the burden estimates for the cost interviews (Appendices G3, G4, and G5), as the data retrieval is part of the process of searching existing

¹¹ The SFA On-Site Cost Interview will be administered over the telephone to the outlying areas.

data sources, gathering the data needed, and completing and reviewing the collection of information.

Follow-up data collection after the end of SY 2019-2020. The follow-up data collection for SFAs in the OACS full data collection is the same as the data collection for the mainland study (Appendix K1). It will occur in two phases: (1) a web survey of SFA directors plus submission of final expense and revenue statements, and (2) a telephone interview with screen sharing. The FSMC manager in Guam will be asked to schedule an interview and upload financial records (Appendix G12), but the will not be asked to complete the SFA Follow-Up Web Survey.

In the second phase, trained contractor staff will review and abstract financial information from the SFA expense and revenue statements in preparation for the SFA Follow-Up Cost Interview (Appendix G13). Interviewers will conduct these interviews over the telephone using screen-sharing technology (when feasible) to ensure shared understanding of the revenues and expenses (and their subcomponents) and final indirect cost rates for SY 2019-2020. We will provide respondents with a user-friendly reference guide (Appendix G14) to facilitate the interview. In Guam, two respondents—one for the SFA and one for the FSMC—will complete the SFA Follow-Up Cost Interview.

OACS limited data collection activities. Fewer instruments will be administered for the OACS limited data collection, and all data will be collected at the SFA level only. We will send each SFA director a user-friendly reference guide (Appendix G8) prior to conducting the SFA On-Site Cost

Interview (Appendix G3)¹² by telephone. Each SFA director will participate with the district business manager in the cost interview. The cost interview will be limited to the modules on SFA staff salary and time allocation and the preliminary expense statement. Interviewers will also use the Food Cost Worksheet (Appendix G6) to collect and review for completeness food price documents SFA directors will be asked to compile and submit in advance of the interview (Appendix C27). The follow-up data collection after the end of the school year will occur in two phases: (1) SFA directors will complete the SFA Follow-Up Web Survey (Appendix G11) and work with district business managers to compile and submit final expense and revenue statements, and (2) SFA directors and district business managers will complete the SFA Follow-Up Cost Interview (Appendix G13) by telephone. We will schedule the interviews and provide document submission instructions via email to SFA directors (Appendix G12), and we will provide a user-friendly reference guide to facilitate the interviews (Appendix G14). The SFA Follow-Up Cost Interview (Appendix G13) will omit the module on indirect costs because it is not needed for the OACS limited data collection.

A.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.

In compliance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce

¹² As noted above, the SFA On-Site Cost Interview will be administered over the telephone to the outlying areas.

respondent burden. Surveys of SFA directors, SNMs, and school principals (Appendices F4, F7, and F8) will be web-based.

The Electronic Menu Survey (EMS) will also be web-based (Appendices E1 and E2). The EMS is a user-friendly web system that includes several features for reducing the burden of the hard-copy Menu Survey forms used in previous studies of school meals. For example, the Menu Survey screener questions are administered before the target week to identify which Menu Survey forms are relevant to a school, on the basis of its food service program. Rather than asking SNMs to participate in a telephone-based training on how to complete EMS forms, those instructions will be provided using brief modular, online training videos. SNMs can review this information at their convenience and interact with TAs over the phone whenever needed. The EMS includes a dashboard so that respondents may track their progress completing the forms each day during the target week. It also allows respondents to create an electronic “favorites” list for saving information on foods offered repeatedly across the week. The EMS includes a variety of validation checks that alert respondents to missing, out-of-range, or inconsistent data.

Most of the cost data collection instruments (Appendices G3, G4, G5, and G11) will be computer-assisted instruments, which will both decrease respondent burden and increase data quality. Burden will be reduced by programming skips for nonapplicable questions; pre-filling information from prior instruments or questions, therefore removing the need for duplicative questions or the manual entry of linking codes (for example, a code that links

staff salaries to staff activities); and automatically calculating cost totals in lieu of respondents completing the calculations. Data quality will improve with the use of edit checks. We will also use screen-sharing when possible to facilitate the cost study interviews when these interviews do not take place in person. The SFA Follow-Up Web Survey (Appendix G11) will be self-administered over the web. Use of a web-based survey will enable us to reduce respondent burden associated with organizing paper documents and transcribing repeated information between forms; a web-based form will also streamline the process of data retrieval, cleaning, and coding.

We will use CAPI software to conduct the Student Interview (Appendices I1 and I2) and collect data on students' dietary intakes (Appendix I5). The AMPM obtains information from respondents in five standardized steps designed to efficiently collect complete and accurate food intake data while minimizing respondent burden.

The Parent Interview (Appendices I3 and I4) will be fielded as a multimode instrument, available for parents to complete over the web or by phone. This multimode administration will offer parents greater flexibility, such as accessing the survey on a mobile device at all hours, and may help gain cooperation among respondents who do not care to speak over the telephone. Out of the total 47,583 responses for this collection, 14,810 (31%) will be collected electronically.¹³

¹³ The estimated number of responses collected electronically includes web, CAPI, CATI, or submission of an electronic spreadsheet or data extract.

A.4. 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.

There is no similar information collection. 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. FNS solely administers the school meal programs.

A.5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Excluding the largest SFAs (described further in Supporting Statement Part B.2), approximately 523 SFAs in the sample, or 97 percent of the SFAs participating in the study, fall below the threshold to be considered a small entity.¹⁴ Although there are small SFAs involved in this data collection effort, they deliver the same program benefits and perform the same functions as any other SFA. Thus, they maintain the same kinds of information on file. The information being requested is the minimum required for the intended use. Out of the total 14,355 respondents for this collection, 1,738 respondents (13%) are considered small entities.¹⁵

¹⁴ According to OMB Form 83-1, “a small government entity may be... a jurisdiction which is a... government of a city, county, town, township, school district, or special district with a population of less than 50,000.” Nearly all SFAs qualify as small SFAs. We have estimated that the approximately 15 SFAs in the certainty selection for the mainland study are not small entities.

¹⁵ The respondents from these SFAs include superintendents, SFA directors, LEA business managers, and menu planners. Of the 1,792 unique SFA-level respondents, 1,738 (97%) are expected to be from small entities.

A.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 proposed data collection activity involves a one-time data collection for each respondent in the mainland study and for respondents in Alaska, Hawaii, Guam, and USVI in the outlying areas. The proposed data collection involves two rounds of data collection in Puerto Rico. First, SFA respondents will participate in the limited data collection. A second round of data collection, the full data collection, will take place in a subsequent school year. Two rounds of data collection are planned for Puerto Rico because its public SFA is in the process of restructuring and is expected to be establishing the new structure during SY 2019-2020. Its operations are therefore not expected to be in a steady state at that time. The second round of data collection will enable FNS to estimate the Territory's meal costs after it has established steady-state operations following the restructuring. Without this information, FNS will not be able to assess progress toward key strategic goals for the NSLP and SBP or identify related training and technical assistance needs of SFAs and schools.

As described in Section A.2 and Appendix K1, the contractor will also follow up with respondents for the Menu Survey and the cost study data collection to clarify responses or obtain missing information.

A.7. 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;**

FNS is requesting that school liaisons return the completed rosters within two weeks after they receive the request in order to allow sufficient time to ensure that the roster is complete, draw the sample of students, distribute consent materials to parents, and receive consent/non-consent before data collection. In many cases, we expect that SFAs and schools will be able to extract the roster data from an existing database within this timeframe, but will also work with respondents to accommodate longer timelines if needed.

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

- A.8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

A.8.1. Federal Register Notice and Comments

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, June 27, 2018, volume 83, number 124, pages 30095-30100. The public comment period ended on August 27, 2018. FNS received a total of eight comments, three of which are germane to SNMCS-II (Appendices L1 through L3). Appendices M1 through M3 include FNS's responses to these comments, which are also summarized here. None of the comments resulted in changes to the study. One commenter expressed concern with the study burden but another stated the burden was appropriate. Efforts to minimize respondent burden include using electronic data collection and collecting data from State agencies rather than from SFA and school staff.

Commenters recommended potential study topics or research questions. Most of these recommendations were already part of the study plans,

including studying SFA or school participation in other child nutrition programs, such as the Child and Adult Care Food Program or Summer Food Service Program, or capturing information about environmental factors associated with plate waste. However, it is outside the scope of SNMCS-II to assess parent or student perceptions of SFA or school participation in multiple child nutrition programs, or to estimate the startup or ongoing costs of Breakfast after the Bell implementation.

One commenter expressed concern that the plate waste data collection methodology was inadequate if a post-consumption-only design was used. Plate waste observations will be conducted before and after each meal, and FIs will purchase reference portions of some foods to assist with the observations (see Appendix K1).

One commenter, writing on behalf of a professional organization, offered to convene a working group to assist with pre-testing the data collection instruments. It was not possible to convene such a group for SNMCS-II because the pre-test already engaged nine individuals (see Section B4).

Two commenters expressed concerns that findings from SNMCS-I have not yet been disseminated. FNS plans to release the SNMCS-I reports to the public. Dissemination plans for SNMCS-II are described below in Section A.16.

Among the five comments that were not germane to the study, one from the School and Nutrition Association intended for the School Breakfast Program Study was forwarded to the appropriate staff within FNS to respond (Appendix L4). Three comments expressed opinions on government spending for school meals or for the study (Appendices L5, L6, and L7). FNS

believes the proposed collection of information is necessary and will have practical utility, no changes in response to these comments. Another public comment was in support of Senate Bill 1036 and contained no contact information (Appendix L8). Since none of the comments were within the scope of this information collection, FNS has made no modifications as a result of these comments.

A.8.2. Consultations Outside of the Agency

Consultations about the research design, sample design, data sources, and study reports occurred during the study's design phase and will continue to take place throughout the study. Following are the individuals outside the agency who have reviewed and commented on the study's comprehensive study plan:

School Nutrition and Meal Cost Study-II – OMB Supporting Statement, Part A

Name	Degree	Title	Organization	Phone Number
Julie Boettger	Ph.D., R.D.	Former SFA Director and owner	Metamorphosis Communications LLC	219-661-8738
Trent Buskirk	Ph.D.	Director, Center for Survey Research	University of Massachusetts	781-964-4997
Patricia Guenther	Ph.D., R.D.	Research Professor, Department of Nutrition and Integrative Physiology	University of Utah	801-449-0726

The information request has also been reviewed by Hua Fan with the USDA National Agricultural Statistics Service (NASS) with reference to the statistical procedures. Those comments are in Appendix N. Comments from individuals outside the agency informed the overall approach to the information collection and are incorporated appropriately throughout the OMB supporting statement.

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

Incentives for this data collection are planned for the Menu Survey respondents (except the SFA directors in the limited-approach OACS), Group 2 school liaisons, and parents and students. Considerable experimental evidence has demonstrated that offering incentives encourages those less interested in the research to participate.^{16,17} The use of incentives is part of a multidimensional approach to promoting participation and minimizing nonresponse bias. Other approaches include minimizing response burden, communicating the importance of the study, and attempting to reach

¹⁶ Groves R. M., M. P. Couper, S. Presser, E. Singer, R. Tourangeau, G. Acosta, and L. Nelson. “Experiments in Producing Nonresponse Bias.” *Public Opinion Quarterly*, vol. 70, no. 5, 2006, pp. 720–736.

¹⁷ Singer, E., and R. A. Kulka. “Paying Respondents for Survey Participation.” In *Studies of Welfare Populations: Data Collection and Research Issues*. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press, 2002, pp. 105–128.

nonrespondents multiple times.^{18,19} The incentives acknowledge that respondents' timely responses and assistance are critical to addressing the objectives of SNMCS-II.

The efforts of Menu Survey respondents and Group 2 school liaisons require significant time and flexibility beyond their normal job responsibilities. The Menu Survey is estimated to take 8–10 hours to complete, including training time. Both the need for training respondents and the plan to support respondents with telephone and online technical assistance speak to the complexity of the instrument and the unusual burden on respondents. Without complete data from the Menu Survey, we will not be able to address three of the mainland study's primary objectives—to determine the food and nutrient content of school meals and the overall nutritional quality of these meals, to determine the cost of producing school meals, and to describe students' plate waste. Similarly, we will not be able to address the OACS study objective of determining the cost of producing school meals in the outlying areas without complete data from the instrument. The Menu Survey will be completed over several consecutive days, which necessitates SNMs spending time beyond their normal working hours to complete it in addition to their job responsibilities. SNMs will receive a pre-pay incentive of \$75, and an additional \$25 after we have verified that they have provided complete data on the Menu Survey (Table A.9.1). The second payment is designed to improve data quality and reduce survey costs

¹⁸ Groves, R., E. Singer, and A. Corning. "Leverage-Saliency Theory of Survey Participation: Description and an Illustration." *Public Opinion Quarterly*, vol. 64, no. 3, 2000, pp. 299–308.

¹⁹ Singer, E., and C. Ye. "The Use and Effectiveness of Incentives in Surveys." *Annals of the American Academy of Political and Social Science*, vol. 645, no. 1, 2013, pp. 112–141.

by incentivizing SNMs to provide complete data and, if needed, to quickly respond to requests for clarification after the target week, thus reducing item nonresponse. Pre-paying incentives for surveys of establishments has been shown to increase response rates more than promised incentives alone (in surveys that were not interviewer-mediated), and can be more effective than even a promised incentive with a higher value.²⁰ The incentive amounts can help to offset the financial burden that many respondents will incur as a result of participation, such as childcare that may be needed for SNMs to complete the survey during non-working hours, cell phone and internet costs for calls with TAs outside of working hours, as well as the opportunity cost of potentially needing to purchase rather than prepare meals for themselves or household members due to time spent completing the information request. The average hourly cost for a babysitter is \$15 per hour,²¹ and by conservative estimates, the average cost for purchasing a meal is \$9 more than the average meal prepared at home.^{22,23} The total incentive would offset approximately 4 hours of child care and three purchased meals for an average household in 2018, with 0.58 children and 2.53 total members.²⁴

²⁰ James, J. M., and R. Bolstein. "Large Monetary Incentives and Their Effect on Mail Survey Response Rates." *Public Opinion Quarterly*, vol. 56, 1992, pp. 442-453.

²¹ SitterCity. "How Much Should You Pay Your Babysitter or Nanny?" March 2019. Available at <https://www.sittercity.com/parents/using-sittercity/how-much-should-you-pay-your-sitter-or-nanny>. Accessed April 24, 2019.

²² Money Under 30. "The True Cost of Eating Out (And How to Save)." April 2019. Available at <https://www.moneyunder30.com/the-true-cost-of-eating-in-restaurants-and-how-to-save>. Accessed April 24, 2019.

²³ Forbes. "Here's How Much Money You Save By Cooking At Home." July 2018. Available at <https://www.forbes.com/sites/priceconomics/2018/07/10/heres-how-much-money-do-you-save-by-cooking-at-home/#74bc852235e5>. Accessed April 24, 2019.

²⁴ United States Census Bureau. "Average Population Per Household and Family." November 2018. Available at <https://www.census.gov/data/tables/time-series/demo/families/households.html>. Accessed April 24, 2019.

School liaisons are the linchpin for successfully recruiting students and parents in Group 2 schools and coordinating data collection activities at the school. School administrators and staff play an essential role in student and parent recruitment, including obtaining consent.^{25,26} The cooperation of school liaisons is critical to obtaining representativeness in the student sample. Esbensen et al. found that, when active consent is used for school-based research, rates of consent were lower among disadvantaged schools (that is, Title I schools, schools with high student-teacher ratios, and/or large proportions of students eligible for free/reduced price meals). Therefore, we plan to provide an incentive in recognition of the burden they incur in this critical role of supporting the in-person data collection effort. For SNMCS-II, the liaisons' role will include providing guidance to the study team about the most effective means of communicating with students and parents, providing student and parent contact information, and providing critical planning information for on-site data collection. Table A.9.1 summarizes the incentives for school staff. For schools where a passive consent process is used, liaisons will receive \$30. In schools where active consent is required, liaisons may be asked to follow up directly with students and parents who have not responded and so will receive \$60 total for performing this additional task. Liaisons will also coordinate in-school data collection activities, including distributing reminders to selected students and escorting students to and

²⁵ Harrington, K. F., D. Binkley, K. D. Reynolds, R. C. Duvall, J. R. Copeland, F. Franklin, and J. Raczynski. "Recruitment Issues in School-Based Research: Lessons Learned from the *High 5 Alabama Project*." *Journal of School Health*, vol. 67, 1997, pp. 415-421.

²⁶ Esbensen, F., C. Melde, T. J. Taylor, and D. Peterson. "Active Parental Consent in School-Based Research: How Much is Enough and How Do We Get It?" *Evaluation Review*, vol. 32, no. 4, 2008, pp. 335-362.

from the area where Student Interviews, 24-hour recall interviews, and height and weight measurements will be conducted. All liaisons will receive \$35 in recognition of their assistance with the on-site activities. Because completing these study-related responsibilities in addition to normal job responsibilities may require time outside of normal working hours, the incentive is designed to offset financial burden such as childcare expenses. Both Menu Survey respondents and school liaisons can donate this gift to the school if required by school policy. No incentives are planned for SFA directors or school principals.

Table A.9.1. Incentives for School Staff

Staff Member	Activity	Gift Card Amount
School nutrition manager	Menu Survey completion	\$75
School nutrition manager	Menu Survey data retrieval	\$25
Group 2 school liaison	Parent consent facilitation	\$30 (passive) or \$60 (active)
	On-site data collection coordination	\$35

Note: We will adhere to district or school policy if employees are prohibited from accepting incentives.

Completing data collection with parent-student dyads is also critical to addressing the key research objectives. As mentioned above, offering incentives encourages those less interested in the research to participate. Students will be selected randomly for the study, and will include those who participate in school meals programs as well as those who do not. Since topic salience is also a driver of survey participation,²⁷ the study will be less salient to students and the parents of students who do not take part in school meals, or only take part minimally. These individuals are less likely to be motivated by the study topic to participate. The planned incentives for parents and students (Table A.9.2) are designed to increase sample

²⁷ Groves et al., 2006.

representativeness by encouraging participation among those who have less interest in a study about school meals. The amounts are commensurate with those in SNMCS-I, with the exception of elementary school parents, whose incentives have been reduced because of the reduction in burden from the in-person completion of the parent-assisted portion of the dietary recall for SNMCS-I to phone completion for SNMCS-II. The amounts are also similar to the \$25 post-pay incentive that OMB approved for respondents who completed the web-based Parent Survey for the Project LAUNCH Cross-Site Evaluation (OMB Control Number 0970-0373, Expires 10/31/2019) after data collection had started and it was found that early respondents were not representative of their communities. Minorities, individuals with lower incomes and education levels, and those who worked part-time or were unemployed were underrepresented. Completion rates and representativeness both improved following the addition of the incentives.²⁸ Elementary students, as well as middle/high school students selected for a second dietary recall will also receive a ruler, measuring cups, and measuring spoons to assist with portion size estimation for the dietary recall that is not completed in person. These measuring aids are essential for accurately completing the dietary recalls, which are used for key study analyses.

Table A.9.2. Incentives for Students and Parents

Respondent group	Gift card amount
Elementary school students	\$5
Elementary school parents	\$25

²⁸ Lafauve, K., K. Rowan, K. Koepp, & G. Lawrence. “Effect of Incentives on Reducing Response Bias in a Web Survey of Parents.” Presented at the American Association of Public Opinion Research Annual Conference: Denver, CO, May 16-19, 2018.

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Respondent group	Gift card amount
Middle/high school students	\$15 (weekdays) or \$20 (Saturdays) ^a
Middle/high school parents	\$15
Second dietary recalls for elementary school students and their parents	\$25
Second dietary recalls for middle/high school students	\$15

^aWe estimate that 12 percent of middle and high school students will be interviewed on Saturdays to measure Friday dietary intakes. These students will receive a slightly higher incentive, which helps offset transportation costs if they choose to be interviewed at a location other than home, such as a public library. Because they will need to be interviewed outside of school, there is an increased likelihood of nonresponse for interviews scheduled on this day of the week.

Experiments testing the use of incentives in telephone surveys of the general adult population, similar to the parents included in SNMCS-II, support the use of a promised incentive to improve response rates.^{29,30,31} Brick et al. observed a dramatic effect in their experiment comparing \$10 and \$5 incentives. The response rate for the \$10 group was 25.8%, compared to 18.6% for the \$5 group. In their 2015 meta-analysis of monetary incentives and response rates in household surveys, Mercer et al. noted the variability in the effectiveness of incentives across experiments. However, across the studies included in the meta-analysis, the authors concluded that promised incentives in the range of \$15 to \$30 could be expected to raise telephone survey response rates 6 to 7%, compared to no incentives.

²⁹ Brick, J. Michael, P.D. Brick, S. Dipko, S. Presser, C. Tucker, and Y. Yuan. “Cell Phone Survey Feasibility in the U.S.: Sampling and Calling Cell Numbers versus Landline Numbers.” *Public Opinion Quarterly*, vol. 71, no. 1, Spring 2007, pp.23-39.

³⁰ Mercer, A., A. Caporaso, D. Cantor, and R. Townsend, R. “How Much Gets You How Much? Monetary Incentives and Response Rates in Household Surveys.” *Public Opinion Quarterly*, vol. 79, no. 1, Spring 2015 pp.105-129.

³¹ Cantor, David, Barbara O’Hare, and Kathleen O’Connor. 2008. “The Use of Monetary Incentives to Reduce Nonresponse in Random Digit Dial Telephone Surveys.” In *Advances in Telephone Survey Methodology*, edited by James Lepkowski, Clyde Tucker, J. Michael Brick, Edith de Leeuw, Lilli Japiec, Paul Lavrakas, Michael Link, and Roberta Sangster. Hoboken, NJ: Wiley & Sons Publishing.

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

All respondents' information will be kept private and not disclosed to anyone but the analysts conducting this research, except as otherwise required by law. Section 9(b) of the National School Lunch Act (Public Law 103-448) restricts the use or disclosure of any eligibility information to persons directly connected with the administration or enforcement of the program.

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). It discusses the terms of protections that will be provided to respondents. This information collection request requests personally identifiable information and includes a form that requires a Privacy Act Statement.

The individuals at the SFA or school district level participating in this study will be assured that the information they provide will not be released in a form that identifies them. No identifying information will be attached to any reports or data supplied to USDA or any other researchers. For data collected through the State-level surveys, and for the OACS data collected from SFA directors in the single SFAs in Guam and Hawaii, the State educational agency finance officers and SFA directors may be publicly known, but individual respondents will not be identified by name.

During the life of the project, hard-copy documents will be stored in secured file cabinets and rooms, and electronic data will be maintained on secured, password-protected computer servers. Names and phone numbers

will not be linked to participants' responses, survey respondents will have a unique ID number, and analysis will be conducted on datasets that include only respondent ID numbers. Files containing personally identifiable information will be transferred by means of a secure file transfer site. Both sources of data will be accessible only by approved contractor staff. At the close of the study, all hard-copy documents will be shredded.

All contractor staff are required to sign a confidentiality agreement (Appendices O1, O2, O3, and O4). In this agreement, staff pledge to maintain the privacy of all information collected from the respondents and not to disclose it to anyone other than authorized representatives of the study. A discussion of privacy and obtaining parent consent and student assent will be included during training sessions to staff working on the project. In addition, an IRB has reviewed and approved the study procedures, including procedures to ensure respondents' privacy (Appendix C1).

To enable other researchers to replicate SNMCS-II analyses or to address other research questions, a public-use database will be created for the mainland study. The database will include all of the variables that were collected or computed during analyses carried out to address the study's research questions. To protect the privacy of respondents, we will exclude from the public-use data files any information that might enable users to identify specific schools, districts, or individuals.

A.11. 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.

The Parent Interview and the Student Interview (including height and weight measurement) include questions that may be sensitive. The contents of these interviews have been used extensively in previous surveys with no known evidence of harm. All parent and student respondents will be informed that participation is voluntary, they can decline to answer any question they do not wish to answer, and there are no negative consequences for not participating. Respondents will also be assured of privacy at the outset of the interview. If required by the district, students will receive a copy of the parental consent form, which describes how their privacy will be protected. (Procedures for obtaining consent and assent are described in Section A.2.1.) All survey responses will be held in a secured manner; respondents' answers will not be reported to school officials or any other program or agency but will be combined with the responses of others so that individuals cannot be identified. FNS and the contractor will comply with the requirements of the Privacy Act.

Survey questions in the Parent Interview on the following topics may be considered sensitive: eligibility for free or reduced-price meals, race and ethnicity, household composition, parent/guardian education and employment status, total household income, receipt of public assistance, household food security status, and housing status. The following topics in

the Student Interview for middle/high school students may be considered sensitive: youth food security status, gender, losing weight or avoiding weight gain, a request for parent contact information, and a request for the student's phone number if selected for a second recall. Except for gender, elementary school students will not be asked these questions. The youth food security questions are new to SNMCS-II but have been administered in other studies.^{32,33} All other potentially sensitive questions in both the Parent and Student Interviews have remained nearly unchanged from SNMCS-I. The collection of this information, other than contact information, is necessary for addressing one of the study's primary objectives: to explain differences in student participation in and satisfaction with school meal programs. Measurements of student height and weight, together with age and gender, will allow us to estimate school meal program participants' and nonparticipants' body mass index to compare aggregate weight statuses between the two groups. Collecting parent contact information during the Student Interview will allow the study team to contact parents to complete the Parent Interview, and collecting the telephone numbers of middle and high school students who are selected for a second dietary recall will facilitate completion of the recall interview.

With the exception of questions about middle/high school student food security, the questions identified above from the Student Interview were also

³² Connell, C., M. Nord, K. Lofton, and K. Yadrick. "Food Security of Older Children Can Be Assessed Using a Standardized Survey Instrument." *The Journal of Nutrition*, vol. 134, 2004, pp. 2566-2574.

³³ Fram, M., E. Frongillo, C. Draper, and E. Fishbein. "Development and Validation of a Child Report Assessment of Child Food Insecurity and Comparison to Parent Report Assessment." *Journal of Hunger & Environmental Nutrition*, vol. 8, no. 2, 2013, pp. 128-145.

used in the third School Nutrition Dietary Assessment (SNDA-III) (OMB Control Number 0584-0527, Discontinued 01/31/2008). Questions similar to those concerning the household's income and public assistance receipt by the household have been used successfully in SNMCS-I as well as the SNDA studies and the Access, Participation, Eligibility, and Certification studies (OMB Control Number 0584-0530, Discontinued 10/04/2017).

For Group 3 and OACS SFAs, the only data collected that may be considered sensitive are staff salaries. However, district and school staff are considered public employees whose salaries are of public record. These data are essential to computing the cost of food service labor, which is a critical component to the calculation of the total cost per meal. To alleviate concerns about sharing staff salaries, we will ask for average salaries across staff who do the same tasks. We will also remind respondents that individuals will not be identified.

A.12. Provide estimates of the hour burden of the collection of information. The statement should:

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

The public entities affected by this study are State/Territory, local, and tribal governments, including State agencies, local education agencies and school food authorities; private sector for-profit businesses (food service management company staff); and individuals, including elementary and secondary students and parents. With this submission, there are 14,355

respondents, 47,583 responses, and 26,438 burden hours.³⁴ The table included in Appendix P shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection. Estimated response times are based on response times for similar instruments completed by the same types of respondents in SNMCS-I and informed by pretesting of select SNMCS-II instruments and protocols. The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2018 National Occupational and Wage Statistics, Occupational Group (http://www.bls.gov/oes/current/oes_nat.htm).

Average hourly wage used for Groups 1, 2, and 3 include SFA Director or LEA Business Manager - (Education Administrators, All Other) - \$43.06, Menu Planner (Dietitians and Nutritionists) - \$29.43, School Nutrition Managers (Food Service Managers)-\$28.35, School Staff Liaisons (Education, Training, and Library Occupations, All Others) -\$27.22, Superintendent (Education Administrators, Postsecondary) - \$53.47, Principal (Education Administrators) - \$46.65, Parent (All Occupations) - \$24.98, State Child Nutrition Director or Education Agency Financial Officer (Financial Analyst) - \$48.55, and FSMC Manager (General and Operations Managers) - \$59.56. Students (elementary and secondary school students) were assumed to not have an hourly wage rate. Average hourly wage rates are taken from: Bureau of Labor Statistics, Wages by Occupation, May 2018. To account for a fully-loaded wage rate, an additional 33 percent was added to the hourly wage.

³⁴ Totals include responses and burden associated with respondents and non-respondents.

Average hourly wage used for full data collection in outlying areas (Alaska, Hawaii, Guam, Puerto Rico and the U.S. Virgin Islands) include SFA Director, LEA Business Manager, Superintendent or State Child Nutrition Director- (Education Administrators, All Other)- \$43.14, School Nutrition Managers (Food Service Managers)- \$28.97, State Education Agency Finance Officer (Financial Analyst)- \$34.56, Principal (Education administrators, elementary and secondary)- \$38.21, and FSMC Manager (General and Operations Managers)- \$40.53. The hourly wages calculated are the mean of the average hourly wage rate for each area, except for "Education Administrators, All Other" in Hawaii and the U.S. Virgin Islands, where the rate was not available. Outlying area principal wages were calculated by dividing total annual salaries by 2,080 work hours per year (40-hour weeks for 52 weeks). The hourly wage rate for respondents for the limited data collection in outlying areas is reported for Puerto Rico only, and includes SFA Director, LEA Business Manager, Superintendent or State Child Nutrition Director- (Education Administrators, All Other)- \$47.18. Average hourly wage rates used for the outlying areas are reported in: Bureau of Labor Statistics, State Occupational Employment and Wage Estimates, May 2018 (<https://www.bls.gov/oes/current/oesrcst.htm>). Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. The total estimated cost of respondent burden is \$999,251.88, including fringe.

A.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 and start-up or ongoing operation and maintenance costs associated with this information collection.

A.14. 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 annualized government costs include the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The total cost to the Federal government for all tasks is \$20,105,377.12, or \$4,021,075.42 on an annualized basis for five years.³⁵ This information collection also assumes a total of 5,720 hours of Federal employee time (5,200 hours for a GS-13, Step 10 program analyst at \$61.77 per hour and 520 hours for a GS-14, Step 10 branch chief at \$73.00 per hour for supervisory oversight). Including 33% for fringe benefits, the total for Federal employee time equals \$477,688.12 (total federal staff costs of \$359,164 + \$118,524.12 to account for the fringe costs) over the life of the contract. Federal employee pay rates are based on the General Schedule and locality payment for the Washington, D.C., Metropolitan Areas provided by Office of Personnel Management for 2019 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB_h.pdf).

³⁵ If the feasibility reassessment to be conducted in Puerto Rico in spring 2019 supports proceeding with the full data collection in SY 2020-2021 or SY 2021-2022 (see Section A.2), the duration of the project will be extended to accommodate the study activities.

A.15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new information collection that will add 26,438 burden hours and 47,583 responses to the OMB inventory as a result of program changes.

A.16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

The contractor will analyze the information collected using descriptive tabular, cross-tabular, and multivariate modeling and analysis. For the mainland study, the team will prepare and release five detailed reports, a methodological volume, and a summary report oriented toward lay audiences. The reports will address the various major areas of interest encompassed in the study's objectives. The team will prepare and release one report for the OACS. All reports will be posted on FNS's website. In addition to the study reports for the mainland study, the contractor will prepare one journal article to submit for publication in a peer-reviewed journal.

Many of the tabulations will mirror those completed for SNMCS-I and previous national FNS school meal program studies to provide the most reliable findings possible of how national policy changes have affected school meal operations and outcomes, such as nutrition quality of meals and meal costs. The key domains in the mainland study are (1) SFA and school characteristics, student participation in school meal programs, and environments and school food service operations; (2) nutritional characteristics of school meals; (3) school meal costs and revenues; and (4) student characteristics and participation, satisfaction with meals (including

plate waste), and dietary intakes. The mainland study's integrative structure will support use of descriptive cross-tabular and multivariate methods to explore relationships among these key domains, with particular focus on the relationships among healthy meals, costs, and student participation. The analyses of each domain will be conducted individually before the integrative analyses. School meal costs and revenues is the key domain in the OACS.

For each of the substantive domains, the analysis will follow these key steps:

Prepare analytic files. Each data file will be checked for missing or inconsistent data and for outliers, cleaned and recoded as needed for statistical analysis. This is straightforward for interview data, especially the web-based surveys, but cost and Menu Survey data will need considerable manipulation and detailed data checking in preparation for analysis. Data from the Menu Survey, the plate waste observations, and the dietary intake interviews will need to be coded to reflect the foods identified and, in Groups 2 and 3 only, the nutrients they contain—a task that involves use of highly technical software, specialized databases, and skilled coders.

Prepare sampling weights. The data will be weighted to produce nationally representative tabulations at each appropriate level of analysis (SFA, school, student and parent, and meals) for the mainland study. For the OACS, the data will be weighted to produce representative estimates for each individual State or Territory. Raw sampling weights will be the inverse of the probability of selection for each observation. Weights will be adjusted for survey nonresponse and may be poststratified to match key benchmarks.

Specify tabulations. For each study domain in the mainland study, researchers will specify tabulations of the data for SFAs, schools, students and their parents, or meals nationally and for subgroups of policy or nutritional interest. Key subgroups include SFA and school size (enrollment), poverty level, urbanicity, FNS region, school type (elementary, middle, high), and school meal participants/nonparticipants. As appropriate, analyses will be compared to results from SNMCS-I, taking into account any methodological limitations to such comparisons. In addition, analyses of the food and nutrient content of school meals will be compared to nutrition standards in effect at the time the data were collected, students' diets will be compared to federal dietary guidance for healthy diets, and middle and high school students' reports of food security status will be compared to parents' reports of food security status. For the OACS, researchers will specify tabulations of the data for SFAs and schools (full data collection only) that will provide State- or Territory-level estimates of costs and revenues. As appropriate, findings for each outlying area will be compared to findings for the continental U.S. and DC.

Estimate descriptive statistics, including cross-tabulations, using appropriate statistical methods. As in the SNMCS-I and SNDA studies, most of the SNMCS-II analysis—for both the mainland study and the OACS—will be straightforward descriptive tabulations (producing estimates of means, proportions, and distributions) and bivariate (cross-tabular) analysis of surveys and observations. Analyses will be conducted using statistical software such as SAS or Stata to compute standard errors that adjust for the

complex sample design. In addition, nutrient data collected in Groups 2 and 3 will be analyzed with special statistical methods to estimate the distributions of usual nutrient intakes, using two days of dietary intake data for a subsample of students. In the mainland study, statistical tests for differences between key subgroups will also be conducted. Differences in mean outcomes of interest between pairs of groups will be tested using t-tests for means. For tests of association between a mean and a grouping variable with three or more categories (for example, the association between reported cost per lunch and region), we will use f-tests. Although the principal measures of interest will be means, we will use chi-square tests for frequency measures when applicable.

Estimate multivariate regression models. The mainland study will examine meal costs and other outcomes as a function of student, school, and school food service characteristics using single-equation multivariate models. These will be estimated as reduced-form models, in that the variables that mediate the outcomes—such as the characteristics of meals offered when analyzing participation or student dietary intakes—are omitted from the model to determine the associations of the broader policy variables, while controlling for other exogenous factors. Recursive models will be used to examine the relationships among the school meal program costs and outcomes.

Project Time Schedule

Recruitment for SNMCS-II must begin by the start of a school year so that data collection can take place the following spring before the end of the

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school year. The schedule below assumes activities can take place in SY 2019-2020 following OMB clearance.

Activity	Schedule
Mainland study; OACS full data collection in Alaska, Guam, Hawaii, and USVI; OACS limited data collection in Puerto Rico	
Recruit SFAs	Beginning 9/3/19
Conduct Data Collection	1/1/20–1/29/21
Analyze Data and Prepare Reports	4/1/20–9/14/22
Prepare Data Files and Documentation	3/30/21–8/5/22
OACS full data collection in Puerto Rico ^a	
Recruit SFAs	7/1/20-12/31/20 or 7/1/21-12/31/21
Conduct Data Collection	1/1/21-1/28/22 or 1/1/22-1/30/23
Analyze Data and Prepare Reports	4/1/21-9/29/23 or 4/1/22-9/30/24
Prepare Data Files and Documentation	4/1/22-8/31/23 or 3/31/23-8/30/24

^aThe timing of the study will be determined in the feasibility reassessment to be conducted in spring 2019. See Supporting Statement Part A.2.

OACS = outlying areas cost study; SFA = school food authority; USVI = United States Virgin Islands.

A.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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.

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