

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-[XXXX]:

Turnip the Beet! High Quality Summer Meals Program

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A1. Circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Turnip the Beet is a voluntary annual award program to recognize participating sponsoring organizations (sponsors) in the Summer Food Service Program (SFSP) or the National School Lunch Program (NSLP) Seamless Summer Option (SSO) that work hard to offer high quality, nutritious meals during the summer months. During the summer months when school is not in session, the SFSP and SSO work in tandem to serve approximately 146 million meals to 2.7 million children up to age 18 nationwide. SFSP is administered through sponsoring organizations that host meal sites in a wide variety of settings. SSO is administered through sponsoring school districts, offering an opportunity for the districts to provide a seamless transition between school meals and summer meals. Turnip the Beet is a tool to motivate summer meal sponsors to go above and beyond basic regulatory requirements for the respective program meal patterns.

All information required to nominate a sponsor for a Turnip the Beet award is submitted voluntarily by interested sponsors and reviewed by their respective State administering agencies. The nomination process allows FNS to accurately assess the quality of meal service in order to determine whether the individual sponsor qualifies for Turnip the Beet recognition, and at what level (bronze, silver, or gold). FNS may collect this voluntary information under US Code: 42 USC 1761 Richard B. Russell National School Lunch Act (Appendix O).

The Turnip the Beet Pilot Program was approved under OMB# 0584-0606 FNS Generic Clearance for Pre-Testing, Pilot, and Field Test Studies. Turnip the Beet was not included as

part of the 2019 generic renewal because this generic is for pre-testing and pilots and Turnip the Beet was out of the pilot stage. FNS is submitting this as a New Information Collection because this new collection will cover burden now that Turnip the Beet's pilot proved the program's success and USDA has decided to make it an ongoing program. We are now submitting a new ICR package to cover the burden associated with this annual award.

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The information collected will be used by Food and Nutrition Service (FNS) staff to determine Turnip the Beet award winners. Voluntary nomination packets will be solicited through the FNS public website as well as through Partnerweb announcements to State administering agencies.

The nomination packets will include checklists for both State agencies and FNS Regional Offices to verify that the packet is complete. A complete packet will include the name and contact information for the nominated sponsor, responses to four short answer questions about the meal service, and a one-month menu with sufficient detail to assess key indicators of meal quality (e.g., whole grain-rich items, percent milk fat) (Appendix B). Complete nomination packets will be sent via e-mail from State agencies to FNS, where a small team of trained Child Nutrition Programs staff reviewers (typically two per nomination) will score the nominations based on objective criteria for each short answer question and menu element (e.g., at least half of the grains served are whole grain-rich). A total point score will be calculated for each nomination packet; any application that reaches a minimum pre-defined score will receive a bronze, silver, or gold award, depending on the final point total. Award-winning sponsors will be notified through their State agencies, and will receive a certificate from FNS. They may also be mentioned on the

USDA blog and/or highlighted on the Meals for Kids Site Finder web tool

(<https://www.fns.usda.gov/meals4kids>). All information on the award, including instructions for submitting nominations and scoring criteria, will be updated annually on the FNS website (<https://www.fns.usda.gov/sfsp/turnip-the-beet>).

FNS has received both formal and informal feedback from State agencies and sponsoring organizations indicating that Turnip the Beet adds value to the SFSP and SSO by encouraging sponsoring organizations to think creatively and strive for best practices in their summer meals, thereby improving children's access to nutritious, well-balanced meals. In turn, this allows FNS to administer summer meal programs that serve the needs of communities nationwide, placing an increased emphasis on the health of children without additional regulatory requirements for meals.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The nomination packet will be available in Microsoft Word and/or Adobe PDF and will be downloadable from the FNS website. The nominations may be typed or handwritten and must be submitted to the State administering agency per State guidance. The State agencies will submit the nomination packets to FNS via email.

A4. Efforts to identify duplication.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in

Question 2.

There is no similar information collection. Every effort has been made to avoid duplication.

FNS solely administers and monitors the Turnip the Beet program.

A5. Impacts on small businesses or other small entities.

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

This information collection has been held to the minimum required for the intended use. FNS estimates that up to 50 percent of the 150 sponsors (businesses) are small entities. Therefore, out of the 186 total respondents for this collection, FNS estimates that approximately 75 (40%) are small entities.

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Turnip the Beet is designed as an annual award to recognize outstanding efforts within a program year. Collecting this information less frequently would diminish the accuracy of the results and alter the nature of the program.

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

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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

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

The 60 day notice entitled, “Turnip the Beet! High Quality Summer Meals Award Program” was published in the Federal Register on February 7, 2020 (85 FR 7266). The public comment period ended on April 7, 2020. A total of eight (8) comments were received, including two from State agencies, one from a professional association, four from school districts, and one from a member of the general public (Appendices E through M). All comments were submitted through

www.regulations.gov. Seven of these comments were specific to Turnip the Beet; all seven were positive, citing benefits of Turnip the Beet on the local summer meal programs. The two State agency commenters also indicated that the burden on sponsors and State agencies is minimal. One commenter spoke only more broadly about SFSP paperwork requirements unrelated to Turnip the Beet.

The comments were generally very short, with commenters universally stating their appreciation of Turnip the Beet, describing the benefits of Turnip the Beet to their summer meals program (e.g. enhanced staff motivation), and/or requesting that Turnip the Beet be reinstated. Based on the comments received, FNS is proposing no changes to the ICR. No issues or concerns were presented that required FNS action beyond a generic response. Thus, on April 23, 2020, FNS emailed the following response to each commenter (7) who provided a valid email address (Appendices N.1-N.7): “Thank you for your comment on the Federal Register Notice: Turnip the Beet! High Quality Summer Meals Award Program (Docket Number: FNS-2020-0009). One commenter provided no contact information, and thus FNS could not respond to this commenter. All public comments will be taken into consideration and addressed in the information collection request submitted to the Office of Management and Budget (OMB).

The following individuals have been consulted about burden estimates associated with this data collection: 1. Andrea Golfen, Community Nutrition Program Specialist, Arizona Department of Education, Health and Nutrition Services, 602-542-8700; 2. Danielle Turk, Education Specialist, Alabama State Department of Education, Child Nutrition Programs, 334-694-4656; and 3. Kristine Matsuura, Nutrition Specialist, Ontario-Montclair School District, 909-930-6360. Ms.

Golfen, Ms. Turk, and Ms. Matsuura supported FNS' burden estimates, stating that the estimates seemed appropriate. Ms. Golfen and Ms. Turk spoke positively of Turnip the Beet, citing the wide interest among program operators in their states. Ms. Matsuura characterized Turnip the Beet as a motivator for her school food service colleagues to work hard and serve high-quality meals.

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

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

Turnip the Beet does not provide financial incentives to respondents. Sponsors qualifying for a Turnip the Beet award receive signed certificates, recognition on the USDA blog, or recognition on the Meals for Kids tool on the FNS website, depending on the award level achieved. FNS does not provide any other payments or gifts.

A10. Assurances of confidentiality provided to respondents.

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

The Department complies with the Privacy Act of 1974. Personally identifiable information (sponsor name and address) will be shared as described in the nomination packet if a sponsor is selected for a Turnip the Beet award; specifically, the sponsor's name may be featured on the USDA blog or the name and address may be featured on FNS' Meals for Kids tool. FNS will not divulge any of the remaining information provided by sponsors or State agencies with any other public or private entities at any time.

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions of a sensitive nature, such as sexual

behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The Turnip the Beet nomination packet does not include any questions of a sensitive nature.

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

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

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

FNS expects 150 sponsors to respond once per program year; each response should take approximately one hour to complete. In addition, FNS expects 36 State agencies to be involved in reviewing nomination packets and completing a one-page checklist to verify that the nominees are program participants in good standing. State agencies will review approximately 4.17 nominations, at 0.5 hours each. Based on FNS's experience during the pilot phase, when this was covered under the Generic IC package (OMB 0584-06060), we know the growth rate year to year. We are applying the growth rate from a prior year to predict growth this year. The expected number of sponsors and State agencies was calculated by applying the same percent growth to 2018 participation as was seen between 2017 and 2018. The total burden is expected to be 225.06 hours each year.

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

The estimate of respondent cost is based on the burden estimates and utilizes the U.S.

Department of Labor, Bureau of Labor Statistics, May 2019 National Occupational and Wage Statistics, Occupational Groups (35-1010) and (25-0000) (https://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage for functions performed by supervisors of food preparation and service workers at sponsoring organizations is estimated at \$18.82 per staff hour. The hourly mean wage for functions performed by State agency reviewers is estimated at \$27.75 per staff hour. With a burden of 150 hours at \$18.82 per hour, plus a burden of 75 hours at \$27.75 per hour, the base annual respondent cost is estimated at \$4,904.25. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$1,618.40. Thus the total annual respondent cost is \$6,522.65.

| Respondent category | Type of respondents | Instruments | Number of respondents | Frequency of response | Total annual responses | Hours per response | Annual burden (hours) | Hourly wage rate | Total Annualized Cost of Respondent Burden |
|---------------------|-----------------------------------|--|-----------------------|-----------------------|------------------------|--------------------|-----------------------|------------------|--|
| Business | SFSP or NSLP/SSO Program Sponsors | Turnip the Beet Award Nomination Packet | 150 | 1 | 150 | 1 | 150.0 | \$ 18.82 | \$2,823.00 |
| State Government | State Program Staff | Turnip the Beet Award State Agency Checklist | 36 | 4.1666666 | 150 | 0.5 | 75 | \$ 27.75 | \$2,081.25 |
| | TOTAL | | 186 | 1.613 | 300 | 0.750 | 225 | | \$4,904.25 |

A13. Estimates of other total annual cost burden.

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

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

A14. Provide estimates of annualized cost to the Federal government.

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

The Federal cost of collecting and processing information related to Turnip the Beet is presented below. FNS identified the functions performed by Regional office and National office personnel, and estimated the total number of staff hours spent performing these functions based on feedback from the staff members.

| (1) | (2) | (3) | (4) | (5) |
|--|--|-------------------|-------------|--------------------|
| FUNCTION | DONE BY | TOTAL STAFF HOURS | HOURLY RATE | TOTAL FEDERAL COST |
| Reviewing nominations for completion and following-up with State agencies as necessary | Regional offices (GS 11-12) | 74.9 hours | \$42.52 | \$3,184.37 |
| Training reviewers and scoring nominations | National office and Regional offices (GS 11-13) | 70 hours | \$46.99 | \$3,289.30 |

| | | | | |
|---------------------------|-------------------------|----------|---------|------------|
| Recognizing award winners | National office (GS-13) | 10 hours | \$55.93 | \$559.30 |
| TOTAL | | | | \$7,032.97 |

Using the 2020 Federal Wage Salary Tables, we estimated the salary rate at \$42.52 per hour (the average hourly salary for a GS 11/12) for the Regional office work and \$55.93 per hour (the average hourly salary for a GS-13), for the National office work. We used the pay table for the Chicago-Naperville, IL-IN-WI as a proxy for the Regional offices and the pay table for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area for the National office. In each case, we used the step 5 hourly wage to average the salary for GS-11 and 12 $[(\$38.67 + \$46.36)/2 = \$42.52]$, GS-11, 12, and 13 $[(\$38.67 + \$46.36 + \$55.93)/3 = \$46.99]$, and GS-13 $[\$55.93]$, respectively. Our computations are:

FEDERAL SALARIES

| | |
|---|--------------------------|
| Salaries (74.9 hours @ \$42.52 + 70 hours at \$46.99 + 10 hours at \$55.93) | \$ 7,032.97 |
| 33 % for Administrative overhead | \$ 2,320.88 |
| Federal Cost | <u>\$9,353.85</u> |

A15. Explanation of program changes or adjustments.

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

This submission is a new information collection request as a result of program changes and will add 225 burden hours and 300 responses to OMB’s inventory.

A16. Plans for tabulation, and publication and project time schedule.

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

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

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

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

FNS does not have any exceptions to the certification statement.