

**Supporting Statement for
USDA Professional Standards Training Tracker Tool (PSTTT)**

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Project Officer: Kaushalya Heendeniya

U.S. Department of Agriculture

Child Nutrition Programs, FNS

Braddock Metro Center II

1320 Braddock Place

Alexandria, VA 22314

(703) 305-0037

Kaushalya.Heendeniya1@usda.gov

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Supporting Statement – Part 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 USDA Professional Standards Training Tracker Tool (PSTTT) was developed by the Nutrition, Education, Training and Technical Assistance Division of the Food and Nutrition Service (FNS) for all school nutrition professionals working for the school meal programs, which includes the National School Lunch Program (NSLP), School Breakfast Program (SBP), NSLP Afterschool Snack Service, and preschools operating under the NSLP and SBP. The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals (See APPENDIX A). To meet the training requirements and assist in keeping track of training and training courses, FNS has developed a web-based application tool with a SQL-server database which is available to local educational agencies and school food authorities through the FNS public website, with a login authentication. These resources facilitate compliance with HHFKA requirements and are provided at no cost to the state, district, or school nutrition professionals.

2. 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 Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See APPENDIX A). The rule, published March 2, 2015, requires a minimum amount of annual training hours for all State agency (SA) personnel (state directors of school nutrition programs and state director of distributing agencies) and school nutrition professionals (school nutrition program directors, managers, and staff). All school and State agency nutrition professionals are responsible for meeting their own training requirements. A manager can monitor to ensure his/her employees are meeting their requirements. The rule requires each school food authority to maintain records that annually document compliance with the professional standard requirements for all school nutrition program employees. Documentation must be adequate to support to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards. For their ease, school food authorities (SFA) and SAs have the option to use a tracking tool (such as USDA's PSTTT) to assist in keeping track of the training activities. With a tool such as PSTTT, a SFA or SA may generate annual records for verification of training completed. Documentation such as copies of the training agenda, sign-up sheets, and other paper documents are also acceptable. Each SFA decides how to maintain the records to document training completion. The burden for State directors and SFAs to maintain records to demonstrate compliance with the professional standards is included

on the ICR - 7 CFR Part 210 National School Lunch Program and Administrative Reviews in the School Nutrition Programs (OMB CONTROL NUMBER 0584-0006)

Required training topic areas will vary according to position and job requirements. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals. To meet the training requirements and assist in keeping track of training and training courses, FNS developed a web-based application tool with a SQL-server database which is available to local educational agencies and school food authorities through the FNS public website. See APPENDIX B for sample screenshots of the PSTTT.

Using the PSTTT supports State and school nutrition professionals to keep track of their training hours. By tracking their success, employees are motivated to build their skills and empower staff to lead and efficiently operate school nutrition programs. School food authority-level compliance with the professional standards is included as a part of the Administrative Review (AR) conducted by State agencies every three years. The ARs are done on the current school year, but may look back on previous year. The AR is a comprehensive off-site and on-site evaluation of all school food authorities participating in the National School Lunch Program, School Breakfast Programs and other Federal school nutrition programs. As a feature of the PSTTT, generated reports can be easily viewed during the AR by State agency personnel to verify compliance with the required annual training hours. While the requirement for the annual training hours is mandatory, using this tool to track the training is voluntary. Users have the discretion on how

frequently to record their trainings. They can enter their training on occasion, quarterly, weekly, monthly, and/or annually to log in training to meet the required hours for their position. State and local school district nutrition professionals can also use other means to track their training. PSTTT is used by an audience (school nutrition professionals and state agency personnel) that varies widely in technical resources and knowledge, and the web application was made to be intuitive to use and accessible to all local school districts. In addition, it is imperative that there is a mobile friendly version of this PSTTT application to ensure easy usage and accessibility across mobile devices. This allows users to enter their training information at their pace either directly after a training has been completed or at a later time and date. A training video (See APPENDIX D), along with a user guide (See APPENDIX E) on using the PSTTT is available on the PSTTT web site. The training videos and user guide are meant to equip the users with the tools and knowledge needed to assist in using the PSTTT.

Create Profile – The user can create

The user can create a user profile with the following information: school district/address; school name/address; school nutrition professional – contact information/email address; title of school nutrition professional or role in school nutrition program; and hiring date. The user will be logging in the following training information: key area; training topic; learning objective; training title; training hours/minutes; date of training; and provider or organization offering training, including state, local, or national.

The PSTTT has multiple time saving features available that are helpful for users. This tool provides a list of trainings in the database that users can select and the course information and training hours auto-populate. Users can also enter multiple learning objectives or training topics for one-single training. Managers can enter trainings for multiple employees at the same time. This tool shows managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement. The tool also provides other great features, such as: running reports, printing certificate of completion once annual training requirements are met, editing files, deactivating employee profiles of staff no longer at the organization, auto-populating school contact information (available through school database where data is imported from the National Center for Education Statistics (<https://nces.ed.gov/ccd/elsi/tableGenerator.aspx>)), bi-annual email reminder notification to complete remaining training hours to meet annual requirements, and ability to export and save results in multiple file formats, including PDF (.pdf), Excel and Word or higher (.docx). It has a user-centered, simple, intuitive interface, making this tool more user-friendly and easy to navigate.

Information Logged In

The user logs the following training information: key area, training topic, learning objective, training titles, training hours/minutes, date of training, and provider of training.

Reports

Summary and detailed reports can be generated by the user and display completed hours of training to be used during the AR. The reports can be a summary of one or more employees at a time by providing quick glance of their status with the annual training requirement. Additionally, the detailed report provides information on individuals or all staff pertaining to training hours that are grouped by training topics and objectives, certificates of completion, date range, etc.

This is an extension, without change, of a currently approved information collection.

There have been no changes in the collection requirements or the burden since the last submission.

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.

Data collection is 100 percent electronic. The tool is available through the FNS public website. Users create a profile using the following information: school district/address, school name/address, individual name, email address, title of their position, and hiring date. Managers are able to create user profiles for their own employees. In addition, there is a mobile friendly version of this PSTTT application to ensure easy usage and

accessibility across mobile devices. The application is compatible with all mobile operating systems (iOS, Android, and Windows).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

There is no similar information collection. Every effort has been made to avoid duplication. This is USDA's first and only web based tool to track professional standards. The previous version (USDA Professional Standards Training Tracker Tool Version 1) was a downloadable application. The web-based tool version replaced the first downloadable version. The web-based version was developed to address feedback received from Version 1.0 users. FNS solely administers and monitors the Administrative Review process; professional standards training is one of the requirements tracked as part of that review.

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

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information. The PSTTT has multiple time-saving features that are helpful for users. This tool provides a list of trainings in the database that users can select, and the course information and training hours auto-populate. Users are also able to enter multiple learning objectives or

training topics for one single training. Managers can enter trainings for multiple employees at the same time. This tool shows managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement.

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.

This is an ongoing, voluntary information collection that is needed in order to meet requirements outlined in the Healthy Hunger-Free Kids Act of 2010 regarding Professional Standards. The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See APPENDIX A). Not meeting the yearly training requirements will put the particular school or district out of compliance. The organizations are given a period of time for corrective actions. Using the PSTTT is just one of the tools available for tracking required training and is strictly voluntary. School nutrition professionals can decide which tool or method of tracking training requirements fits best. They also have the option to decide how frequently they will record the trainings (on occasion, quarterly, weekly, monthly, and/or annually).

As part of the Professional Standards requirements for school nutrition professionals and State agency personnel, State reviewers have instant access to the PSTTT to obtain

information for the AR. By school nutrition professionals entering their training information, State reviewers can gather information for the AR before going onsite to the School Food Authority. This time-saving feature reduces the time the reviewer would have to spend at the facility. It also reduces the review time by having all the information in one location and not having to review multiple sheets of paper. Additionally, school foodservice directors or authorized personnel may regularly peruse their staff accounts to ensure trainings are recorded regularly. The previous version of the PSTTT was a downloadable application with limited capabilities.

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;**

Users can decide when and how frequently they want to record the trainings- the Professional Standards regulations require school nutrition professionals to have a record to show the completed hours by the end of the school year. Since it is up to the users to track their completed training, they can choose to track their trainings as they are taken, on a weekly reporting basis, monthly, when they gather information for performance reviews, etc. Since this is the case, FNS expects that the information will be recorded on a weekly, monthly, quarterly, or annual basis or as it occurs on occasion. Administrative reviews occurs every three years and school nutritional professionals are required to have their yearly records showing completed training requirements ready to submit every 3 years for the administrative review.

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

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

A notice was published in the Federal Register on February 20, 2020, Volume 85, pages 9724-9725. The comment period ended on April 20, 2020. FNS received five comments in response to the notice, but only three were applicable for PSTTT. Two groups (School Nutrition Association Task Force and California Department of Education) and one anonymous commenter submitted multiple comments concerning the burden of logging in training information and not being able to import previously recorded training documents from the other tracking tool (APPENDIX F). The FNS response to the comments from the two groups are also included in this package (APPENDIX G). The School Nutrition Association Task Force (SNA) commented that although the FNS Professional Standards Training Tracker Tool has many fields and extensive data to record, it remains a bit cumbersome, especially as districts would have to re-enter information that was already in an existing database. SNA would like the PSTTT to have the capacity to import data from a district spreadsheet to be more convenient and helpful for school nutrition programs to use (See APPENDIX F3). FNS stated that it was understood that it would be helpful for districts to be able to import data from another

tool into the USDA PSTTT and that work is currently being done to explore the ability to add this functionality to the PSTTT (See APPENDIX G1). SNA also had concerns that were related to general professional standards requirements and not directly related to PSTTT. They requested that FNS review the June 30 deadline to complete professional standards requirements for the current school year 19-20, since most school districts across the country have closed schools due to the pandemic and school nutrition programs are immersed in emergency feeding activities. FNS responded and indicated that there are several existing flexibilities to assist school nutrition professionals in meeting professional standards requirements, such as: (1) School nutrition personnel that have a hire date after January 1 of the school year, only have to meet half of the required training hours, (2) For those staff that may be considered as “temporary,” “substitute,” and “acting”, State agencies have the option to extend the training standards to acting and temporary personnel, substitutes, and volunteers. State agencies will need to determine, based on the circumstances, if temporary workers at a school food authority (SFA) should be subject to the annual training standards. A State agency that chooses this option should establish written policy and procedures, and communicate these to the SFAs, to ensure the SFAs comply with the State agency requirements., and (3) As stated in the regulation at §210.30(e), at the discretion of the State agency, excess annual training hours may be applied to the school year directly preceding or directly following the date of the training.

The California Department of Education (CDE) commented on their wishes for users to be able to download the application to their own systems and to delete the requirement for a login in order to decrease any barriers to using the tool (See APPENDIX F2). FNS

responded by reminding CDE that the Professional Standards Training Tracker Tool (PSTTT) 1.0 was available as a downloadable Microsoft Office® Access form to be used on computer desktop (See APPENDIX G2). Due to overwhelming feedback from users, USDA developed the web-based version to provide additional functionalities and capabilities. FNS stated that users are required to create an account and login in order to save all recorded training information and that the user account provides a safeguard to protect and prevent loss of data.

FNS also received comments to the 60-day notice from someone identified as “Jennifer Anonymous” that did not include complete contact information (See APPENDIX F1). Jennifer commented that “Most of our trainings have a sign in sheet. It would be a lot of work to enter each employee for each training when instead you could have a spreadsheet with everyone's name and job title and the different sections and just check off the employees once you get the sign in sheets. It might be good for Manager staff because they can log themselves in and often do "other" training in addition to the Food & Nutrition Services training. I don't understand the reason for the certificate (especially if we are trying to have a reduction in paperwork) when an Excel document generated from the website would/should be enough for an auditor.” In response to this comment, FNS points out that the use of the USDA Professional Standards Training Tracker Tool (PSTTT) is voluntary. The tool has many timesaving features such as the recording of training for multiple employees at once, running reports, auto-filling in school information, auto-filling training information after selecting from a database of training, and an auto-email notification system. The tool is designed so that individuals can track

their own training, or one designated person can be assigned to record and track training for the entire organization (i.e., school, district, State agency). FNS is working toward adding the capability for directors to import an employee roster into the PSTTT. The certificates are an additional documentation that is optional. FNS added the certificate feature based upon school nutrition professionals' feedback. Users of the tool have the option to run a report, submit a certificate, or both.

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.

Prior to the tool being released in 2018, FNS continued to work with the Professional Standards Tracking Tool Testing/Working Group Team Members (PSTTT Team), consisting of FNS staff, external members, and additional stakeholders. Prior to the initial release of the tool, the PSTTT Team participated in user acceptance testing and provided comments and input by emails via the testing documents on the design, development, and

usability of the tool. These comments were considered with some being implemented before the release, and others added to the list for consideration for future releases (See APPENDIX H1-H3). A list of these team members can be found in APPENDIX I. Some of these comments included:

- Simplifying the process for adding a manager's email address to connect to the employee (Kim Goebel (Kim.goebel@lausd.net) and Dawn Soto (Dawn.soto@lausd.net); both from LA Schools,
 - FNS response: For the first release of the tool, FNS made sure the manager's email address field was no longer a required field. In future releases, implemented a seamless option, which linked the managers to the staff.
- Tool did not allow users to add a training title to the next school year (from Cheryl Johnson, MS, RD, LD, Director, Child Nutrition and Wellness, Kansas State Department of Education, csjohnson@ksde.org),
 - FNS response: For the first release of the tool, FNS ensured that user can add training to the current school year, previous school year, and the next school year.
- Did not allow users to delete a training title from the training history page (from Cheryl Johnson, MS, RD, LD, Director, Child Nutrition and Wellness, Kansas State Department of Education, csjohnson@ksde.org),
 - FNS response: For the first release of the tool, FNS ensured that users can edit a recorded training, remove employees that were incorrectly tagged to

the training title as being completed, and delete a training record altogether that was entered incorrectly.

- Summary reports are not helpful; need to be filtered by school years (from Cheryl Johnson, MS, RD, LD, Director, Child Nutrition and Wellness, Kansas State Department of Education, csjohnson@ksde.org),
 - FNS response: For the first release of the tool, FNS ensured the reports provided accurate information. In future releases, FNS implemented filtering feature for all the different types of reports available to the user to easily filter by school years and also by schools (for users who have recorded information for entire district or multiple schools).

Since the release of the tool, FNS continued to collect feedback from users through email, the “Contact Us” feature on the tool, and at presentations/webinars. These comments were also considered and some have already been implemented, while others are on our list of enhancements for the future. We prioritize the list of enhancements based on the number of requests received for the same feature.

Comments Received in 2018

- Lillian Barnett (Child Nutrition Director, Florence ISD, Texas, lbarnett@florenceisd.net) requested a way to remove an employee that was no longer employed from her employee list. FNS responded, at that time, that the employee could be deactivated on the backend by the contractor. In 2020, FNS implemented the feature that allows a manager or a director user to deactivate employees no longer on staff (i.e., employee has retired or moved to another

school district or another job). In addition, manager or director users can also reactivate employees that have been deactivated in the past.

- Lauren Knight (Consultant, School Food Solutions a foodservice management company, lauren@schoolfoodsolutions.org) requested a way to allow profiles to cover multiple school food authorities across multiple states. Currently, the tool only allows user to be able to record training in one district (for school users) and one state (for State agency users). FNS responded that although this feature is not currently available in the tool, FNS is investigating options to determine if this is a feature that can be implemented in the future with the help of the contractor.

Comments Received in 2019

- Gustavo Godoy Navarro (Nutrition Services Field Supervisor, Beaverton Public Schools, Oregon, gustavo_godoy_navarro@beaverton.k12.or.us) commented that there was a need for a user notification indicating when the system is going to log the user out of the system. FNS responded, at the time, that this is an item on our list of enhancements. Since the time of his comment, FNS has implemented an extension for the logout time, but is still looking to implement a notification feature in a future release.
- Sherry Held (Administrative Review/Compliance Specialist, North Carolina Agency for Public Instruction, North Carolina, sherry.held@dpi.nc.gov) requested a report that would include the date completed for each training. FNS responded, at that time, that this request would be added to the list of enhancements. FNS received this request from multiple users and implemented this feature in 2019.

- Janice King (Food Service Director, Auburn Public Schools, Massachusetts, jking@auburn.k12.ma.us) commented that it would be helpful to have labeling conventions for trainings to make it easier to locate trainings and to enter new training titles. Janice King also recommended that FNS have another marketing push and possibly a webinar to increase exposure of the tool. FNS responded, at that time, that we were trying to come up with a better solution to easily select trainings. FNS has done several clean-ups of the training titles that are not being utilized. In addition, in the training title search results, the training provider information is also included to assist users in selection of training title. FNS continues to research ways to further enhance the usability of the training title search feature. FNS continues promotions of the tool through email, tweets, newsletters, webinars and demonstrations at conference exhibits.

Comments Received in 2020

- Jodi Schneider (Nutritionist, Desert Sands Unified School District, California, jodi.schneider@desertsands.us) requested a way to print reports of staff that do not have trainings logged in the tool. FNS responded that multiple users have requested this feature and recognized that this will be a useful feature for managers and director users. FNS is researching ways to implement this feature as soon as possible. Until it has been implemented, users can compare the existing available reports against the master employee roster to identify missing employees (no hours) or to identify those who have not met training requirements, but do have some hours logged.

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

No payment or gift will be provided to respondents.

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

The Department complies with the Privacy Act of 1974. The Privacy Impact Assessment (PIA) and the Privacy Threshold Analysis (PTA) were prepared, submitted to, and approved by FNS Privacy Officer (See APPENDIX I). Privacy safeguards can be found in the PIA under Section 8.0.

Employees can create their user profiles after receiving confirmation from USDA's eAuthentication. The E-Authentication Guidance for Federal Agencies OMB M04-04 (See APPENDIX K) requires that each and every transaction accomplished by the public in an IT system be evaluated to determine if the level of authentication is sufficient for the transaction (business) performed (E-Authentication Risk Assessment). The authentication focuses on confirming a person's identity, based on the reliability of his or her credential. Authorization focuses on identifying the person's user permissions. M04-04 is concerned with authentication (See APPENDIX K). The FNS Privacy Officer in place at the time that the PSTTT was initially being developed in 2016 advised that a System of Records Notice (SORN) was not needed for PSTTT because it did not collect

PII or retrieve information by personal identifiers itself. The users' first and last name and email addresses are collected through their eAuthentication account and are automatically populated into PSTTT. FNS does not use this personal information. A SORN covering eAuthentication, titled USDA.OCIO-2 eAuthentication Service was published in the Federal Register on March 14, 2012 (Vol. 77, pp 15024-15026) providing overall security for accessing FNS systems. While the ICR does request personally identifiable information, it does not include a form that requires a Privacy Act Statement.

Some school nutrition professionals may not have access to computers. Therefore, managers can create accounts for employees who are unable to create their own. Managers have access to log in training hours to their designated employees. Only managers can search and add his/her employees (who have already created a profile) to their employee roster. A school manager can only add an employee that is in the same school/district and State agency managers can only add a user that is in their state. The federal contractor employees working on the PSTTT must adhere to the contract in place for developing and ongoing maintenance and enhancements and adhere to procedures and policies in place for protecting the information that they see during these activities. The contract specifically states that the use of any information that is subject to the Privacy Act will be utilized in full accordance with all rules of conduct as applicable to Privacy Act Information.

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.

This information collection does not involve questions of a sensitive nature.

12. 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.

This is an extension, without change, of a currently approved information collection. This collection has 10,006 respondents, 70,042 responses, and 17,090 burden hours.

Estimated Number of Respondents: The total estimated number of respondents is 10,006. This includes 6 State agency personnel and 10,000 school nutrition

professionals who voluntarily choose to utilize this tracking tool. All respondents are offered a 60-minute training refresher webinar to highlight enhancements.

Estimated Number of Responses per Respondent: Total estimated number of responses per respondent across the entire collection is 7. The estimated number of responses per respondent for the tracking tool is five. The tracking tool users are first required to create their user profile, which will be saved for future use. It is estimated that the user will be updating and managing their records on a quarterly basis. The estimated number of responses per respondent for the training webinar and the recording of trainings is one.

Estimated Total Annual Responses: 70,042

Estimated Time per Response: The estimated time per response across the entire collection is approximately 14 minutes (0.24 hours). For the training tracker tool, the estimated time of response varies from five to ten minutes depending on familiarity of the tool and the amount of reports created with an average estimated time of 7.5 minutes (0.125 hours) for all participants. The training refresher webinar of 60 minutes (1 hour) is available for all participants. Participants can record trainings into the tracking tool, which is estimated to take 5 minutes (0.083 hours) to complete.

Estimated Total Annual Burden on Respondents: 17,090.25 hours (rounded to 17,090 hours).

See APPENDIX C for estimated total annual burden for each type of respondent.

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 for PSTTT 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 (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage is \$14.65 for elementary and secondary food preparation workers (Occupational Group 35-2021) and \$27.75 for State education occupations (Occupational Group 25-0000). With approximately 80% food preparation users and 20% State agency users, the combined wage for this entire group of users is approximately \$17.23 per hour. The estimated annualized cost to respondents is \$391,638.45 (including fringe benefit cost) calculated as follows:

TOTAL COST TO THE PUBLIC =

$17,090.25 \times \$17.23 = \$294,465.00$

$\$294,465 \times 0.33 = \$97,173.45$ (fringe benefit rate)

$\$294,465$ (initial cost) + $\$97,173.45$ (fringe benefit rate) = **$\$391,638.45$ (total cost)**

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 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.

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

The estimated annualized cost to the Federal government is approximately \$1,018,567.79 (including fringe benefit). The cost estimate for three federal employees is based on a 40% effort (or 1.2 full-time equivalents) at the GS-13 Step 5 average salary in the Washington, DC locality per OPM's 2020 pay charts. Federal employees are the subject matter experts on Professional Standards, FNS programs, and customer expectations, whereas contract staff are responsible for managing the technical aspects of the tool, such as developing, launching, training, and maintaining it with federal employee oversight.

This estimate is based on the following:

| | |
|---|--------------|
| Annual server hosting and maintenance cost: | \$485,000.00 |
|---|--------------|

Three Federal employees* (\$116,353 x 1.2)

\$139,623.60

Contract Staff** (Operations, maintenance & enhancement of tool) \$347,868.40

Subtotal: \$972,492 (initial cost)

\$139,623.60 X 0.33 = \$46,075.79 (fringe benefit rate calculated from federal employee costs)

\$972,492 (initial cost) + \$46,075.79 (fringe benefit rate) = \$1,018,567.79 (total cost)

Total: \$1,018,567.79

* 1.2 Full-Time Equivalents of GS-13 Step 5 salary using 2020 OPM Pay Chart in Washington DC locality

** Cost of awarded contract

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

This submission is an extension, without change, of a currently approved information collection request with 17,090 burden hours and 70,042 responses. FNS does not expect any program changes or adjustments to these estimates. Consequently, FNS estimates that the burden estimates will remain the same for this renewal.

16. 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.

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.

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

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