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United States
Department of Agriculture

Food and Nutrition Service

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Alexandria, VA 22314

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SUBJECT: Justification for Non Material/Non-Substantive Update to OMB Control No: 0584-0656 Summer Food Service Program (SFSP) Integrity Study to Update the State Director Web Survey and Sponsor Interview Guide

FNS is requesting a non-substantive change to the Summer Food Service Program (SFSP) Integrity Study, OMB Control No. 0584-0656; expiration date 7/31/2023.

The objectives of the SFSP Integrity Study are to: 1) examine and describe how State agencies administer and provide SFSP oversight and why they believe it is effective; 2) identify SFSP integrity challenges common across States and types of sites in the administration and oversight of SFSP; and 3) identify existing or State-recommended resources, training, or technical assistance that would better support State agencies in their effective administration and monitoring of the SFSP.

FNS is seeking approval to make minor changes to the State Director Web Survey instrument (C-2) and the Sponsor Interview Guide (C-4) to account for the impact of COVID-19 on SFSP operations; improve the clarity of two questions for respondents; and obtain more specific information about State system capability and reporting. These updates will not affect the burden for respondents.

- COVID-19 disrupted normal operations for many organizations offering the SFSP in 2020. Therefore, we revised the survey instructions to direct respondents to provide information on what was “typical” or “usual” pre-COVID-19. By doing so, the findings will speak to the long-standing policies and procedures for administering the SFSP, rather than those designed for an atypical service period in summer 2020.
- We expanded two previously approved questions (questions E1 and E4 in Section E: Sponsor and Site Approval Process) in the State Director Web Survey to capture information on State procedures and experiences for new vs. returning sponsors, which

may be different in some States, and added language to clarify the definition of “seriously deficient” (question I1 in Section I: Program Terminations and Turnover). These changes will improve the clarity of the questions for respondents.

- We added two “Yes/No” follow-up questions to a previously approved question on site-based claiming (questions G2 and G3 in Section G: Payments to Sponsors), and two short questions (questions G5 and G6 in the same section) on State reporting of average daily attendance to the State Director Web Survey. These new questions will elicit more specificity about State system and reporting capability with a de minimus additional burden on respondents.
- For the Sponsor Interview Guide, an additional probe was added to a previously approved question (#32) on the reporting of average daily attendance. This probe will ask for the specific calculations used currently and suggestions for better methods.

The revised versions of the State CN Director Web Survey and the Sponsor Interview Guide are included as attachments.

Once OMB approves these changes, FNS intends to update the State Director Web Survey and the Sponsor Interview Guide and proceed with data collection.

If you have any questions regarding this request, please contact Christina Sandberg, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2337.

Appendices

Appendix C-2: State Director Web Survey

Appendix C-4 Sponsor Interview Guide