

School Food Purchase Study IV (SFPS-IV)

OMB Supporting Statement

Part A

OMB# 0584-0471

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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 Food Purchase Study IV (SFPS-IV) is the fourth in a series of U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) studies on food purchases made for the National School Lunch Program (NSLP) and School Breakfast Program (SBP), known collectively as the school meal programs. Similar studies were undertaken in School Year (SY) 1984-1985, SY 1996-1997 and SY 2009-2010 (SFPS-I, SFPS-II and SFPS-III, respectively).

SFPS-IV will provide updated national estimates of school food authority (SFA) food acquisitions (commercial purchases and USDA Foods) and a description and analysis of food purchase practices in SY 2021-2022. In addition, the study will assess changes in food acquisitions and purchase practices since SFPS-III, to provide important information about the impact of updated nutrition standards for meals and nonprogram (competitive) foods, and other changes made to the school meal programs following the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). SFPS-IV will provide Federal, State, and local policymakers with current information about how Federally sponsored school meal programs are operating since the last study more than 10 years ago. Information about food buying efficiencies will be useful for SFAs as they strive to maximize available resources and improve food service operations. This

study will include State Directors (Child Nutrition and State Distributing Agencies), SFA Directors, as well as food vendors and food service management companies (FSMCs).

Section 28(c) of the Richard B. Russell National School Lunch Act (Appendix D1) 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 not a new information collection request; it is a reinstatement with changes to a previously approved collection, for SFPS-III (OMB Control Number 0584-0471, expiration date 3/31/2012). The study will collect a broad range of data from a nationally representative sample of 630 public SFAs and their State Distributing Agencies (SDAs), in the 48 contiguous States and the District of Columbia. These data will provide the needed information on how SFAs are procuring foods, the composition of their procurements, and changes that have occurred in the decade since the prior study and the implementation of the nutrition standards for school meals that first went into effect in SY 2012-2013. The study will address several research questions under the following five broad study objectives of interest to USDA, State agencies, SFAs, and vendors/FSMCs, as well as other stakeholders:

1. Develop national estimates of the types, amounts, and costs of food acquired (purchased food and USDA Foods) by local school districts participating in USDA-sponsored nutrition programs.
2. Describe any changes in the mix of foods acquired by schools since the last study of school food purchases (SY 2009-2010) and the extent to which acquired foods are prepared or processed, and the extent to which the relative costs of school food purchases have changed.
3. Compare the mix of foods acquired by various subgroups.
4. Describe current school food purchase practices and identify relationships between food purchase practices/school district characteristics and the cost of foods to schools.
5. Describe the extent to which nonprogram foods are available to students and the types and volume of nonprogram foods purchased.

Participation in the data collection is voluntary and is not required for State agencies or SFAs to obtain benefits. Data collection is not part of an audit or program review. FNS will share publicly the study reports on its website. Information from SFPS-III and prior food purchase studies has been used frequently by FNS to develop impact and cost estimates for proposed changes to program regulations and to the commodities provided to schools through the USDA Foods program; by food vendors and FSMCs to assess trends in food purchases in school food service; and by SFAs and other local-level stakeholders to identify possible approaches to improving their procurement practices.

On behalf of FNS, the information for SFPS-IV will be collected and analyzed by Westat and its subcontractor, Agralytica. Following OMB approval, all SFAs will complete a web-based Survey of Food Purchase Practices (Appendix B7). Sampled SFAs will be divided into four groups and each group will provide detailed food purchase data and revenue and expenditure data for one specified quarter of the school year (three months); these data will be aggregated and used to generate annual food purchase estimates. The food purchase data will be supplemented with information on USDA Foods from SDAs. An Institutional Review Board (IRB) approved the study procedures and instruments (Appendix D2).

The data collection instruments and plans mirror those from SFPS-III with three exceptions:

1. Changes in school meal requirements are accompanied by changes in purchase practices of SFAs. For this reason, survey items that were no longer relevant to current purchase practices have been replaced with items that capture these changes. These changes are detailed at the end of the survey (Appendix B7).
2. The study takes advantage of the advances in technology and employs web-based data collection instead of paper and pencil or hard copy data forms. (We will make paper copies available upon request.)
3. The study includes greater involvement of State Directors, to encourage SFA participation and provide the study with data on USDA Foods.

The revised instruments and approach were discussed and pretested with several subject matter experts and SFA Directors. Findings from the pretest are presented in Appendix D3. The COVID-19 pandemic has impacted school food operations in several ways and USDA, Food and Nutrition Service (FNS) has maximized all program flexibilities and contingencies to serve school meals. Given the limited information on how SFAs are changing their food purchase practices, and to ensure that our data collection methodology is able to capture the school food operations and procurement practices, we will conduct a field test of our data collection procedures with three SFA Directors. This field test will begin by inviting three SFAs to complete the web survey, attend the webinar to submit the quarterly food purchase data, submit the food purchase data, and finally respond to clarification email from the study team.

A.2.1. Recruitment

Immediately following OMB approval, FNS will email the FNS Notification to State Directors (Appendix A1), to Child Nutrition and State Distributing Agencies. The email will describe and endorse the study and ask for the participation of sampled SFAs in their States. It will include a Study Brochure (Appendix A3) and inform the State Directors that a member of the study team will be following up with them regarding the next steps.

SFAs: Within one week of the FNS email to State Directors, the Westat study team will email the State Directors the Notification to States of Sampled SFAs (Appendix A2), requesting their support for the study. This email will provide an overview of the study, the list of sampled SFAs from their State with the quarter of the school year for which they are sampled, and a template State Email to Sampled SFAs (Appendix A4). The State agency can use the template to encourage their SFAs to participate in the survey and notify them that the study team will contact them soon. The notification to States will also request that the State Directors provide or confirm SFA contact information including email addresses, alert the study team of any concerns they have about the inclusion of particular SFAs in the study, and notify the team when the State has contacted its SFAs.

One week following the email to State Directors, the study team will send the FedEx Letter to Sampled SFAs (Appendix B1), which will describe the impetus and objectives of the study, their role, the data collection timeline, and details on the study overview webinar for SFAs. The FedEx package will also include Letters of Support (Appendix A5) from the School Nutrition Association (SNA) and the American Commodity Distribution Association (ACDA), Frequently Asked Questions (Appendix B2), and a Study Brochure (Appendix A3). Within one week of the FedEx package to SFAs, we will email SFAs a Study Overview Webinar Invitation

(Appendix B3). The email will welcome them to the study and include links and other details needed to participate in the webinar.

The Study Overview Webinar (Appendix B4) will be held two to three weeks following the email to SFAs, and will be recorded and posted on the study website for SFAs that are unable to participate and want to view it later. The webinar will highlight the purpose of the study, outline the data collection activities and timeline, and review study resources available for support. Following the webinar, we will send all SFAs the Email with Link to Survey (Appendix B5), with a link and PIN to complete the Survey of Food Purchase Practices (Appendix B7).

We will send a Reminder Email (Appendix A8) up to four times, to SFAs that do not complete the survey; the first reminder will be sent two weeks after the initial email; subsequent reminders will be sent one week apart. We anticipate that most SFAs will agree to participate based on the planned mailing and emails. However, SFAs that do not complete the survey after four reminder emails will be contacted by phone by trained recruiters. Recruiters will begin trying to make phone contact with nonrespondents one week after the fourth reminder email. In the calls, using the Telephone Script to Complete Survey (Appendix B6), the recruiters will explain the importance of the study and address any concerns that the SFAs may have.

Vendors and FSMCs: To help increase awareness of the study, we will send the FNS Notification to Vendors (Appendix C1) to 25 large vendors/FSMCs that serve a significant number of SFAs, at the same time we send the initial study email to SFAs. The letter will inform them of the study and ensure them that the purchase data provided by SFAs will be kept confidential, and only reported in the aggregate and not with any identifying information. We will also attach a Study Brochure (Appendix A3).

State Distributing Agencies: As noted above, within one week of the FNS Notification to State Directors (Appendix A1), the study team will send State Directors the Notification to States of Sampled SFAs (Appendix A2). This email will inform SDAs of the study and request their assistance in providing the study team with data on direct shipped and further processed USDA Foods for the sampled SFAs from their State on a quarterly basis, after the end of each quarter. We will also attach the Overview of USDA Foods Data (Appendix A7), which is a factsheet with needed USDA Foods data elements, format, and submission instructions.

A2.2 Data Collection

The study website (Appendix D5) will serve as a hub for all study information, activities and data collection. We will also maintain a Technical Assistance Center (TAC) with trained staff to provide individualized support to study participants. Study participants will be able to access the study website, e-mail the study team, or call the TAC help line to get assistance with their web surveys or data submissions. The TAC will be available from 9am to 4pm EST and the message line will be available 24/7, with responses provided the following day. If TAC staff cannot answer a question, they will triage it and obtain the answer from senior study staff within 24 hours.

A2.2.1 Survey of Food Purchase Practices

The web-based Survey of Food Purchase Practices (Attachment B7) will collect information on SFA characteristics, procurement practices and procedures used by the SFA, USDA Foods, food vendors that supply foods to their SFA, methods used to comply with the Buy American requirements, and revenue and expenditure data for the prior school year.

Immediately following the Study Overview Webinar (Appendix B4), we will send all SFAs the Email with Link to Survey (Appendix B5). The email will include a PIN the SFAs can

use to access the Survey of Food Purchase Practices (Appendix B7) and instructions to complete the survey. SFAs will have the ability to launch the survey and begin completing it with an option to save it and pick it up later.

We will track survey completion status on a daily basis; this will provide us with an understanding of how many SFAs have not initiated the survey, how many have initiated but not submitted the survey, and how many have successfully submitted the survey. We will send the Reminder Email (Appendix A8) up to four times to SFAs that have either not initiated or not submitted the survey. The first reminder will be sent two weeks after the request, and the remaining three will be sent on a weekly basis. After the fourth reminder, if the SFAs have not initiated or submitted the survey, a member of the TAC will use the Telephone Script to Complete Survey (Appendix B6) to follow-up with these SFAs to ask them to complete the survey by phone as soon as possible or via the link and PIN. The TAC will confirm that the SFA has the email with the PIN to access the website and launch the survey. If needed, the TAC will provide the SFA with the PIN via email.

A2.2.3 Food Purchase Data

We will obtain food purchase data directly from SFAs in the form of vendor summaries (or similar reports) and augment it with data by SDAs for USDA Foods. Sampled SFAs will be divided into four groups and each group will be asked to provide details about the foods purchased (reimbursable meals and nonprogram foods) and USDA Foods received during the specified quarter.

SFAs: Submission of purchase data from SFAs will be preceded by a Purchase Data Webinar (Appendix B9) that provides details and examples of the data needed and submission procedures. We will schedule the quarterly webinar in the first two weeks of each quarter, and

send the Purchase Data Webinar Invitation (Appendix B8) to SFAs two weeks prior to the webinar date. The invitation will contain an overview of the webinar content and a link to join the webinar/call in, and also indicate that the webinar will be recorded and posted on the study website for later viewing if the SFA is unable to participate.

The Email to Submit Quarterly Data (Appendix B10) will be sent approximately two weeks prior to the end of each quarter, to the SFAs sampled for that quarter. It will include the Food Purchase Data Checklist (Appendix B11) specifying the required purchase data elements – type of product, brand name, product code number, unit size, number of cases purchased, unit price, total cost, fuel or other additional charges, and rebates/discounts or credits provided. We will accept food purchase data in a mode and format that minimizes respondent burden, including hard copy vendor receipts if necessary, though we will encourage submission of electronic, editable files if at all possible.

The Email to Submit Quarterly Data (Appendix B10) will also include a link and PIN for the SFA to provide Quarterly Program Data (Appendix B15) via the web. The quarterly program data will ask, for the specified quarter, for information on the number of meals claimed; revenue from nonprogram foods; revenue from other food programs; and total food expenditures. Finally, the email will provide a reminder about the availability of resources on the website, including the webinar presentation explaining data needs and procedures to submit food purchase data, and encourage SFAs to contact the TAC in case they have questions about their submission. We will follow up with nonrespondents by sending the Reminder Email (Appendix A8) up to four times, one week apart. The first reminder will be sent three weeks after the request, recognizing that data compilation will take some time. We will compile the list of SFAs that have not submitted any purchase data and/or submitted quarterly program data one week after the fourth email

reminder, and follow up with them by phone using the Telephone Script to Collect Quarterly Data (Appendix B12). During this phone call, the TAC will inquire about their progress, their timeline to submit the data, and answer their questions.

Consistent with procedures used in SFPS-III, SFAs may choose to provide the food purchase data through one of several ways including vendor summaries, velocity reports, invoices, inventory records, and bid specifications. Based on our understanding of the recordkeeping systems used by SFAs, the majority will be able to provide vendor summaries as they are likely to have these on file and/or will be able to access them directly by logging in to vendor systems. We also expect that some SFAs may provide invoices alone or in combination with vendor summaries.

Once all purchase data are submitted, the study team will review the data to identify missing fields for any food items. We will then send each SFA the Clarification and Confirmation Email (Appendix B13) which will ask SFAs to provide any missing data, and to mark foods used for reimbursable meals, nonprogram foods, or both, and products with USDA Foods. We will send a weekly Reminder Email (Appendix A8) to nonrespondents twice, beginning one week following the initial request for clarifications. One week following the second reminder, we will follow up with nonrespondents using the Telephone Script for Quarterly Data Clarifications and Confirmation (Appendix B14) to obtain the information or clarifications.

SDAs: About six weeks after the end of each quarter of the school year, we will send the email Request to SDAs to Submit USDA Foods Data (Appendix A6). The email will include a “submit by” date, to ensure that the data are received in a timely manner, and the list of sampled SFAs for that quarter. We will follow-up with nonresponding SDAs by sending the Reminder

Email (Appendix A8) twice (one week apart, starting one week after the initial request) and use the Telephone Script to Collect USDA Foods Data (Appendix A9), if needed. We expect SDAs to upload electronic records to the secure study server or email the data with password encryption.

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 respondent burden. The Survey of Food Purchase Practices (Appendix B7) will be web-based and completed electronically. The web survey includes a “save and continue” option, allowing respondents the ability to save their responses and continue the web survey later, and will also include hyperlinks that provide definitions or explanations on technical questions. Automated email notifications will be sent to SFA Directors who have not initiated or initiated but not submitted their survey. Thus, all responses to the web survey are expected to be electronic. SFA Directors are given the flexibility to provide food purchase data in any format that is suitable to them and reduces their reporting burden; most of these data are expected to be submitted electronically. Rather than asking SFAs to participate in a telephone-based training on food purchase data submissions, instructions will be provided using live and recorded webinars. SFAs that are unable to attend live webinars may retrieve the

recordings at their convenience and interact with TAC staff over the phone from 9am to 4pm EST, as needed.

Finally, SFA level USDA Foods delivery information data from SDAs is also expected to be in an electronic format.

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.

Every effort has been made to avoid duplication. FNS has sole responsibility for administering the USDA school meal programs and has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. To our knowledge, there is no similar information available or being collected.

Another FNS study currently underway, the Study of SFA Procurement Practices (OMB # 0584- 0643), is expected to provide some insights into practices of SFAs related to procuring goods and services for five Child Nutrition Programs: NSLP, SBP, Fresh Fruit and Vegetable Program (FFVP), Summer Food Service Program (SFSP), and Child and Adult Care Food Program (CACFP). However, that study does not involve describing types and cost of food purchases and describing changes over time like SFPS-IV. Further, that study does not characterize the contribution of USDA Foods to school meals.

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

Information being requested has been held to the minimum required for the intended use. Out of the total 630 SFAs selected for this study, 611 SFAs (97 percent) are considered a small

entity.¹ Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. Collecting the requested information will not have a significant economic impact on these 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 plan for SFAs involves one-time reporting for each data collection activity: the Survey of Food Purchase Practices and the quarterly data. SFAs will also be asked to confirm purchase data once it is compiled from all sources (SFA and SDA). There will be up to four attempts to reach the respondent to verify accuracy and completeness of food purchase data. The proposed data collection plan for SDAs involves quarterly reporting for the SFA-level USDA Foods data.

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;**
- **requiring respondents to submit more than an original and two copies of any document;**

¹ 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.

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

There are no special circumstances. This collection of information is conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 5 CFR 1320.5.

A.8 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 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.

Federal Register notice and comments

Notice of this study was published in the Federal Register on Wednesday, May 13, 2020 (Vol. 85, No. 93, pp. 28599-28602). FNS received a total of four comments, as provided in Appendices F1 through F4. Appendices F5 through F8 include FNS's responses to the comments. One of the four comments that was submitted in response to this notice actually pertained to a notice for another study, so it was forwarded to the correct party for consideration.

Two of the commenters expressed support for the study, noting the need to obtain updated data on food purchases and the usefulness of the information to various program stakeholders. A third commenter opposed the study, noting that it had been conducted previously and indicating that efforts should focus instead on operating the program. In response to the commenter who opposed the study, FNS reiterated the significant changes in the school nutrition environment in the last decade and the need to obtain updated information.

The two commenters who supported the study also noted the impact that COVID-19 has had on school nutrition program operations and purchases, and recommended that the study proceed but take these changes into consideration during data collection. One commenter provided specific COVID-related questions that could be asked. In response, FNS explained that for this study, all protocols adhere to social distancing and are in fact “contactless,” as there is no in-person data collection. All study communications and data collection will be done electronically (email and web), by telephone, and, if needed, by mail. In addition, FNS agreed that information on the impacts of COVID should be collected, and indicated it will determine the best vehicle for obtaining the information.

One commenter emphasized the importance of providing study participants with clear study information and schedules, and of allowing them to submit data in the format they currently use instead of a new spreadsheet, to reduce burden. FNS confirmed that the study materials, including emails and the study webinars, include clear information and timeframes for what is expected of study participants. In addition, data will be accepted in whatever format is easiest for school food authorities. The same commenter also recommended that FNS create a working group for studies to obtain feedback from school nutrition professionals in development

of study instruments and other materials. In response, FNS indicated the ways in which feedback from school nutrition professionals and other experts was obtained for this study.

Consultations outside 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. Listed below are the individuals outside the agency who have reviewed and commented on the study’s comprehensive study plan. They provided comments on the data collection approach and helped clarify the food purchase data elements available from State agencies and SFAs. We modified the approach and updated study instruments and other materials based on their input.

| Name | Title | Organization | Phone Number |
|-----------------|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------|
| Chris Facha | Program Analyst | Oregon Department of Education | 503-947-5896 |
| Bertrand Weber | Director of Culinary and Nutrition Services | Minneapolis County Public Schools | 612-668-2821 |
| Keith Rushing | Research Scientist | Institute of Child Nutrition, Applied Research Division, The University of Southern Mississippi’s College of Health | 601-543-8866 |
| Stephanie Bruce | Nutrition Service Director | Palm Springs Unified School District | 760-322-4117 |
| Lynn Petrowski | Director of Food Service | Hanover Schools, MA | 781-878-5450 |

The information request has also been reviewed by Dana Butler with the USDA National Agricultural Statistics Service (NASS) with reference to the statistical procedures. Those comments are in Appendix E and are addressed in the Supporting Statement B. 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.

SFA Directors who complete all data collection activities will receive \$300 for their SFA, which may be used to defray the cost of attending a school nutrition conference or similar professional development opportunity.² SDAs will not receive any payments or gifts for participating in the study.

Use of incentives to encourage those less interested in research to participate^{3,4} acknowledges to the respondents that timely responses and assistance are critical to addressing the study objectives. Other approaches to promoting participation and minimizing nonresponse bias include minimizing response burden, communicating the importance of the study, and attempting to reach nonrespondents multiple times.^{5,6}

Submission of detailed quarterly food purchases requires SFAs to compile or access data for all vendors from which they purchase foods, and upload it to the study website. Submission of food purchase data is estimated to take about 5 hours, including training time. The need for training (attending the webinar) and technical assistance speak to the complexity of the data request and the higher-than-usual burden on respondents. The incentives are also expected to

² All SFA Directors who participated as a subject matter expert or pretest respondents indicated most small SFA Directors are routinely unable to attend professional development conferences due to budgetary constraints. The proposed \$300 incentive will increase SFA participation and allow them to attend nutrition conferences or similar professional development opportunities.

³ 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.

⁴ 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.

⁵ 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.

⁶ 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.

improve data quality and completeness – so SFAs quickly respond to requests for clarification or missing data. Similarly, completing the Survey of Food Purchase Practices requires them to gather relevant information from various sources, so they are able to report accurate district level characteristics (e.g., number of schools, enrollment size by school type, revenues and expenditures, etc.). The cooperation of SFAs is critical to obtaining nationally representative data. Without complete food purchase data and survey responses, we will not be able to address the study objectives of describing food purchases (types, amount, and cost) and without the survey responses, we will not be able to describe food purchase practices of SFAs.

Offering SFAs the incentive and encouraging them to use this towards conference attendance or similar professional development opportunities will enable smaller SFAs to attend professional meetings. Finally, offering incentives to SFAs responding to time sensitive and time intensive data collection requests is consistent with the procedures used in SFPS-III.

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

FNS complies with the Privacy Act of 1974 (5 USC §552a). No confidential or personally identifiable information will be requested, reported, or maintained as a result of the data collection activities. None of the forms included in this collection require a Privacy Act Statement. The information gathered in this study will be kept private to the full extent allowed by law. Access to records is limited to those persons who process the records for the specific uses stated in the Privacy Act of 1974. The information will be kept private and will not be disclosed to anyone but the individuals conducting research in this investigation, except as otherwise required by law.

All data collected from the study will be reported in aggregate form so that it cannot be linked back to any individual responses. No names, phone numbers, or any other unique identifiers will be linked to the data or included in any public use data sets or reports. To ensure that all identifying information remains private, the contract executed between FNS and Westat requires that Westat create and keep data on secure networks and utilize data collectors that sign a Confidentiality Agreement (Appendix D4) binding them to protect private information. Each responding SFA will be assigned a unique ID number and the data will be provided to FNS by this ID number. Additionally, data are password-protected. A separate file associating the ID number with the SFA will also be shared with FNS. FNS will keep this file private. Once the contract is over, the study team will destroy all files with identifying information.

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, that discusses the terms of protections that will be provided to respondents.

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.

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

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/local governments including Child Nutrition Agencies, SDAs and SFAs, and private sector for-profit businesses (vendors/FSMCs). With this submission, there are 760 respondents, 18,570 responses, and 4,942 burden hours.⁷

Appendix G 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 SFPS-III and informed by subject matter expert input and pretesting of instruments and protocols. The estimate of respondent cost is based on the burden estimate 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). The average hourly wage is \$48.55 for State Child Nutrition Director or Food Distributing Agency Director (Financial Analyst); \$43.06 for SFA Director (Education Administrators, All Other); and \$59.56 for

⁷ Totals include responses and burden associated with respondents and nonrespondents.

Vendor/FSMC Managers (General and Operations Managers). To account for a fully-loaded wage rate, an additional 33 percent was added to the hourly wage. The total annualized cost of respondent burden is the product of each type of respondent's annual burden and average wage rate. The total estimated cost of respondent burden is \$278,058.39 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/start-up or ongoing operation/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 total annual cost to the Federal Government is \$660,606.57, or \$2,642,426.26 over the 48-month period of the contract. The largest cost to the Federal Government is to pay the contractor \$2,536,390.74 to conduct this study and deliver reports and data files. The information collection also assumes a total of 520 hours of a Federal Employee's time per year for a GS-13, Step 1 in the Washington, DC area, at \$49.19 per hour for a total of \$25,578.80 per year. The information collection also assumes a total of 16 hours of a Branch Chief's time per year: for a GS-14, Step 1 in Washington, DC area, at \$58.13 per hour for a total of \$930.08 per year.

Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2020 for the Washington, DC, metro area locality (for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA)⁸.

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

This submission is a reinstatement request that will add approximately 4,942 burden hours and 18,570 responses to the OMB inventory, and continues the School Food Purchase Study series that assesses school food acquisition changes over time. Since the last study in the series in 2009, school food acquisition has been impacted by program changes, such as the updated nutrition standards in 2012⁹ to align with the Dietary Guidelines for Americans, and the COVID-19 pandemic in 2020. This fourth study in the series will provide insight into the changes since the 2009 study.

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. Most of the tabulations will mirror those completed for SFPS-III and previous national studies to provide the most reliable findings on how national policy changes have affected school food purchase practices and cost. The analysis will begin with a check for missing or inconsistent data and outliers. Data will be cleaned and recoded as needed, for statistical analyses. The data will be weighted to produce nationally

⁸ Office of Personnel Management (2020, January). *Salary Table 2020-DCB*. Retrieved from https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf

⁹ Final Rule: Nutrition Standards in the National School Lunch and School Breakfast Program. USDA FNS, 7 CFR Parts 210 and 220. <https://www.govinfo.gov/content/pkg/FR-2012-01-26/pdf/2012-1010.pdf>

representative tabulations at each level of analysis. Weights will be adjusted for survey nonresponse and may be poststratified to match key benchmarks.

For each study objective, we will specify tabulations to test for differences between key subgroups such as size (enrollment), poverty level, urbanicity, region, and use of FSMCs. 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 food cost 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.

We will examine food costs and other outcomes as a function of SFA characteristics using single-equation multivariate models. When conducted, comparisons of results from SFPS-III will take into account methodological limitations. All analyses will be conducted using statistical software such as SAS or Stata to compute standard errors that adjust for complex study design.

Project Time Schedule

Recruitment for SFPS- IV will begin within one week of OMB approval. The schedule below assumes activities can begin in SY 2021-2022.

Table A.16. Data Collection Schedule

| Activity | Schedule |
|--------------------------------------------------------------------------------|-----------------------------------------------|
| Pretest of web survey and communication materials for purchase data collection | December 2019/January 2020 and April-May 2020 |
| Recruit SFAs and SDAs; Notify Key Vendors and FSMCs | September 2021 |
| Collect data | September 2021 through October 2022 |
| Analyze and tabulate findings | October 2021 through July 2023 |
| Briefing on data tables/results | September 2023 |

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 will display the expiration date for OMB approval of the information collection on all instruments and recruitment materials.

A.18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

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