

**SUPPORTING STATEMENT – Part A FOR**

**OMB Control Number 0584-0494**

**Child Nutrition Database**

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**7 CFR Parts 210.10 and 220.8**

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**A1. Circumstances that make the collection of information necessary.**

**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.**

This is a revision of a currently approved collection. The Child Nutrition Database (CNDB) is a necessary component and is required to be part of the nutrient analysis software approved by the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) in implementation of the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Nutrition Standards in the National School Lunch and School Breakfast Programs final rule (RIN 0584-AD59) was published in the January 26, 2012 Federal Register, Vol 77, No. 17. This final rule sets forth the food-based meal patterns, including requirements for three dietary specifications (nutrient standards) in 7 CFR §210.10 for lunches and §220.8 for breakfasts (Appendix A). The regulations (7 CFR 210.18) also require State agencies (SAs) to conduct a nutrient analysis of school lunches and breakfasts if non-compliance risk is determined as a part of the administrative review (this burden is covered under OMB # 0584-0006 7 CFR Part 210, National School Lunch Program, expiration date 7/31/2023) to monitor compliance with the dietary specifications for calories, saturated fat, and sodium (Appendix A). When needed to determine compliance, SAs are required to use nutrient analysis software evaluated and approved by USDA. The USDA-approved nutrient analysis software must include the CNDB to provide SAs with the nutrient data of foods typically used in school recipes and menus, as well as for food products that are marketed to schools

by food manufacturers. The CNDB, incorporated into the approved nutrient analysis software, provides the SAs with the necessary nutrient information to assess compliance with the dietary specifications. This streamlines the process for obtaining and utilizing nutrient data for SAs and school Program operators.

The CNDB contains nutrient composition data for: 1) food items from the USDA National Nutrient Database for Standard Reference (SR); 2) standardized recipes for Child Nutrition Programs developed by FNS; 3) brand name commercially processed foods; and 4) USDA Foods [previously known as commodity foods]. FNS requires (7 CFR 210.10(i)(2) and 7 CFR 220.8 (i)), that the CNDB be incorporated into the software used for the nutrient analyses in the NSLP and SBP. As a part of the administrative review, when deemed necessary, the State agency staff uses USDA-approved software to conduct a weighted nutrient analysis of reimbursable meals. The ability of SAs to conduct this nutrient analysis of school meals is dependent upon the availability of the CNDB to the software companies.

The CNDB is available free of charge and will be regularly maintained and updated to ensure that the information is accurate and current.

The Agricultural Research Service (ARS) and FNS originally cooperated in the development of the CNDB. Initially, ARS administered, updated, and maintained the CNDB ensuring data accuracy and validity. In recent years, an outside contractor, in collaboration with FNS, has collected the data and managed the database. Most manufacturers that voluntarily submit nutrient information for this collection market their products to schools. Many of these foods are specifically formulated for the Child Nutrition Programs, including NSLP, SBP, Summer

Food Service, and Child and Adult Care Food Programs, making them unique and different from other food products.

## **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 FNS-710 CN Database Qualification Report is a tool, in the form of an Excel spreadsheet, used to collect nutrient data from food manufacturers for commercially processed foods that are sold and marketed for use in school food service. This is a voluntary information collection which covers the food manufacturers who may choose to submit data about their products to FNS to enter in the CNDB. Since nutrient information has been required to be included on retail product labels since July 1994, the nutritional information required for the CNDB should be readily available for all products at no additional cost to the manufacturer.

Nutrient data may be submitted for up to 18 nutrients for each food item. Data for three nutrients, calories, saturated fat, and sodium, are required for each food item that is included in the CNDB. Household serving size information with its corresponding gram weight is also collected and converted to nutrients per 100 grams. Nutrient amounts of other serving sizes (e.g., weight, volume, number of items, etc.) can also be calculated from the “per 100 gram” base amount.

The data is collected from food manufacturers using the FNS-710 CN Database Qualification Report which is available in an Excel spreadsheet format. The original format of the FNS-710 was a paper form. This is no longer used due to lack of demand and use by the respondents. An online Web Tool format was developed several years ago to facilitate ease of entry for both the food manufacturer entering data and the contractor compiling the CNDB; however, this Web Tool was decommissioned in 2020 because the technology was out of date and food manufacturers were demanding the ability to submit data in bulk (for more than one food item at a time). The online Web Tool has not been used for data collection since 2018. The excel spreadsheet format was developed to facilitate a more streamlined submission for large numbers of food products at one time in response to such requests from the food industry. Currently, the spreadsheet format is the only form of the FNS-710 being used.

The frequency of response for new and updated data is once per year. Manufacturers are contacted annually to request updates, deletions, and additions to the data in the CNDB for their products marketed to school food service. Manufacturers who currently have data in the CNDB are contacted by email message to confirm contact information and request updates to their data. Manufacturers who have expressed interest in the past, but not submitted data, are also contacted. An announcement is also sent from PartnerWeb to the Nutrition and Technical Assistance community to try to reach additional manufacturers who may be interested in submitting their data. These updates are included in the next update of the database.

The information gathered for this collection, using the FNS-710 CN Database Qualification Report, is required to be used by private software companies in their nutrient analysis software programs approved by FNS for use in nutrient analyses required in the school meal programs (USDA-approved software). Both the SAs and Program operators use this nutrient information in the approved software programs for auditing and nutrient analysis review purposes. The regulations require that, when deemed necessary, SAs conduct nutrient analyses of school lunches and breakfasts as a part of the administrative review (every 3 years) to determine they are meeting specific nutrient requirements.

USDA-approved nutrient analysis software generates a report that compares a menu's nutrient analysis against the required dietary specifications (nutrient standards) of the school meal programs. This allows a menu planner to modify the menu until the required dietary specifications (nutrient standards) are met to help ensure compliance with these specific nutrient requirements. During the administrative review, SAs use the Program operator's nutrient analysis reports from USDA-approved nutrient analysis software or conduct their own nutrient analyses of a school's offered menus for compliance with the nutrient standards.

Since the previous submission, the spreadsheet has been updated to include the CNDB Number (CN Code or CND#) which facilitates matching to existing data in the CNDB in order to incorporate the updates provided by the manufacturers. The instructions were also revised with examples added to help prevent data entry errors and decrease the need to contact the manufacturer after submission. FNS does not expect the burden to be affected by these changes. Due to a change in how the frequency has been determined, the annual

responses for this collection have decreased. However, although the number of responses for this collection have decreased, the burden hours remain unchanged.

The data collected is not shared with any other organization or agency other than through the CNDB. The completed spreadsheets are not shared or distributed. The sole purpose of the data collection is to contribute to the CNDB. The completed spreadsheets are kept for two years on the NTAB Child Nutrition Database PartnerWeb (SharePoint) community and for seven years on the shared drive in the Child Nutrition Database folder. Data is maintained in the CNDB until the food manufacturer asks for it to be removed or it is deemed to be out of date by the NTAB staff.

### **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.**

According to the E-Government (E-Gov) Act of 2002, Federal agencies are required to provide electronic submission as an alternative to paper submission where feasible. Since 2019, 100% of the submissions have been collected on the Excel spreadsheet format, which are submitted via e-mail. However, at this time, the FNS-710 is not being collected electronically. The original paper format (pdf file) of the FNS-710 was discontinued due to lack of use. In the past, FNS had maintained an online electronic version of form FNS-710, called the online Web Tool for several years. However, this system was decommissioned in 2018 due to the technology and format being out of date.



FNS is currently researching options for modernizing the CNDB, including the data collection, compilation, and dissemination of data. FNS is exploring the use of existing data sets and processes to collect nutrient data for food products marketed to schools. The goal is to facilitate electronic transfer of the data from existing data sources to the CNDB. However, the current process is needed until the new process is finalized and in place.

#### **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.**

Similar nutrient databases exist; however, those do not meet the FNS programs' specific needs for menu and recipe analysis of meals served by schools. Many of these foods listed in the CNDB and served in the school meals are specifically formulated for school food service or the Child Nutrition Programs, including NSLP, SBP, Summer Food Service, and Child and Adult Care Food Programs, making them unique and different from other food products. Manufacturers do not necessarily submit data for these products for the school market to the other similar databases.

When nutrient data for products marketed to schools or other Child Nutrition Programs are included in the CNDB, which is then incorporated into the approved nutrient analysis software, the data for these products are available to Program operators to use in their recipe development and menu planning. When nutrient data for the products they buy and use on their menus is included in the CNDB, it saves the SFAs and State agency staff time that

would be spent to retrieve and enter this data into the approved software themselves. The CNDB also improves accuracy of nutrient data utilized in Child Nutrition Programs because these values are not being entered by hand, and therefore not as prone to data entry error.

**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.**

Currently about half (approximately 50%) of the food manufacturers submitting data using the FNS-710 for the CNDB are small businesses. Submitting data to the CNDB using the FNS-710 reduces the burden to small businesses because they do not have to supply their product nutrient information to every school participating in the Child Nutrition Programs. Nutrient information that is required for submission by a manufacturer has also been held to the minimum (3 nutrients) and small businesses can submit their information using the FNS-710 to one central facility (the FNS CNDB contractor) who will make this information available to all Child Nutrition Programs through the CNDB. Out of an estimated 32 respondents for this collection, FNS estimates that 16 (50%) will be 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.**

This is an ongoing, voluntary information collection that is required under 7 CFR §210.10, §220.8, and 7 CFR 210.18. Food manufacturers are encouraged to update the information for their products annually because the CNDB is usually updated annually. Food products in the marketplace are constantly changing thus requiring an annual collection at a minimum. SAs

and Program operators use information from the CNDB, through a USDA-approved nutrient analysis software program, to comply with the dietary specifications provided in 7 CFR 210.10 and 210.18. If the information were not collected and updated regularly for the CNDB, the nutrient data would become out of date and less useful to Program operators, causing them to rely on their individual vendors for current nutrient data. Both food manufacturers and software developers have expressed the need to update data more frequently than annually. A more frequent update or release is being considered as part of the modernization process for the CNDB, but it will not be implemented during this OMB-approval cycle. By analyzing recipes and menus with a software program that includes the CNDB, Program operators can ensure that their menus meet the nutrient standards in 7 CFR 210.10 and 210.18. These nutrient analyses will be most accurate when manufacturers update nutrient data for their products frequently for the CNDB.

**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.**

A 60-day notice was published in the Federal Register on Tuesday, September 29, 2020 (Volume 85, Number 189, and Page 60958). The public comment period ended on November 30, 2020. Two public comments (Appendix C and E) were received in response to the notice published in the Federal Register.

The first comment, from the School Nutrition Association, focused on the need to include the school Program operators in the plan for modernizing the CNDB. The commenter stated that the CNDB is important to the School Food Authorities (SFAs) and stressed the need to ensure that the data is accurate and updated frequently. The commenter asked that users of the database, including school nutrition Program operators, be included in the planning and testing of the new CNDB process. The response from FNS emphasizes that as we increase the number of products in the CNDB that are marketed to school food service, we will continue to explore ways to compile and provide the data needed by school nutrition professionals. A copy of the response letter is found in Appendix D.

The second comment, from the Natural Products Association, focused on the need to include nutrients from dietary supplements when assessing the intake of children. Since school Program operators do not include supplements as part of school meals and the CNDB provides data to assess the nutrients provided in school meals, supplement data is not needed. The FNS response clarifies that the purpose of the CNDB is for use in software that analyzes meals and measures compliance of menus in relation to established goals and standards. A copy of the response letter is found in Appendix F.

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

**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.**

On December 1, 2020, a representative of a food manufacturer who has submitted data to the CNDB for several years, Marla Hoff from Schwan's Shared Services, provided comments about the CNDB. Ms. Hoff stated, "Being able to submit data directly to the Child Nutrition Database is very helpful for us as manufacturers since that database is then utilized by the USDA approved software that is used in many of our customers' schools. While I appreciate being able to submit data in one large group in a spreadsheet and that process works well

when I have a large group of like products to submit; I struggle with the process for modifying data.” She then explained that it is difficult for her to compile the current data for her company from the current release of the CNDB in order to be able to identify products that need to be updated. She said, ” ... it would be very helpful to have the data collection spreadsheet populated with my current manufacturer data so that I could simply update it on the spreadsheet versus given a blank spreadsheet.” Ms. Hoff also added that they would be supportive of a future state process that could pull data from Global Data Synchronization Network. FNS is working with the CNDB contractor to develop a plan for providing manufacturers with their current data in the CNDB for next year’s data collection.

The contact information for this food manufacturer is:

Marla Hoff  
Sr. Nutrition Affairs Specialist  
Schwan’s Shared Services, LLC  
Phone: 701-260-1849  
E-mail: [Marla.hoff@schwans.com](mailto:Marla.hoff@schwans.com)  
Website: [SchwansCompany.com](http://SchwansCompany.com)

On December 2, Brian Starr from Simplot, a food manufacturer submitting data with the FNS-710 for the first time, expressed concern about the administrative time needed and the potential for errors from manual data entry when using the FNS-710. FNS will consider these comments as we work on modernizing the data collection process for the CNDB database.

The contact information for this food manufacturer is:

Brian Starr  
Business Program Manager  
J. R. Simplot Company or Simplot Food Group  
Phone: (208) 780-8354 or (208) 863-3052  
E-mail: [Brian.starr@simplot.com](mailto:Brian.starr@simplot.com)

Website: [simplotfoods.com](http://simplotfoods.com)

On December 1, the NSLP Coordinator with Child Nutrition Programs for the Idaho Department of Education (a State Agency), Lynda Westphal provided feedback on the CNDB. Ms. Westphal asked that FNS consider limiting the collection of food items to those used in the Child Nutrition Programs. She suggested that FNS omit items such as non-creditable items, as well as alcoholic beverages, restaurant menu items, and energy drinks. Lynda also suggested that the collection include whether the item is creditable. Currently, food manufacturers are asked to submit foods and beverages marketed and sold to school food service. Some of the items suggested are included in the CNDB from the National Nutrient Database for Standard Reference, not provided by the food manufacturers. She also asked if FNS could develop a standardized format for the descriptions provided by food manufacturers. While FNS does not have this in place now, the transition to the new CNDB process may address this issue.

The contact information for the NSLP Coordinator is:

Ms. Lynda Westphal, MHS, SNS  
NSLP Coordinator, Child Nutrition Programs  
Idaho State Department of Education  
650 W. State Street  
Boise, ID 83702  
Phone: 208-332-6825 | [Address](#) | [SDE Website](#) | [CNP Webpage](#)  
E-mail: [ljwestphal@sde.idaho.gov](mailto:ljwestphal@sde.idaho.gov)  
Website: [www.sde.idaho.gov/cnp/](http://www.sde.idaho.gov/cnp/)

On December 14, Catharine Powers, a consultant to the software company Jamix and co-author of a recipe nutrient analysis book, provided the following comment about the CNDB, “Having accurate nutrition information of foods served in schools is critical as we strive to improve the diets of our nation’s children. Menu planners use this essential information to

plan appealing, well-balanced meals. As suppliers continually improve products to meet the needs of schools, and the children they serve, it is critical to have up-to-date data. USDA Nutrition and Technical Assistance Branch serves the essential role of coordinating the data and ensuring that all approved software providers use current data. As an advisor to a software developer, I have high confidence in the CNDB and know that incorporating the database will lead to a more robust and useful software for the school foodservice industry.”

The contact information for this consultant is:

Catharine Powers, MS, RDN, LD  
Partner, Culinary Nutrition Associates LLC  
Consultant to Jamix  
PO Box 5212  
Akron, OH 44334  
Phone: 330-416-5943  
E-mail: [powers@culinarynutritionassociates.com](mailto:powers@culinarynutritionassociates.com)

On November 19, 2019, a software developer with Health-e Pro, a USDA-approved nutrient analysis software program that includes the CNDB, provided feedback to the FNS database contractor as part of their research on the modernization of the CNDB. The database contractor interviewed software developers with USDA-approved software to explore their use of the CNDB and their independent data collection efforts. The developer said that the CNDB is not useful for the following reasons:

- Many manufacturers are not in the CNDB.
- They cannot match products in the CNDB with manufacturers products on their websites, for instance, the Global Trade Item Numbers (GTINs) do not match.
- It is being updated once per year and lots of information are outdated.

Health-e Pro is not targeting specific foods, but they are targeting specific manufacturers.

Health-e Pro is primarily interested in foods marketed to K-12 and Pre-K. Although they



request the manufacturers to send them the products for schools, they also have a small subset of products that are for adults needed by some of their users. There is not a specific attribute in Global Data Synchronization Network (GDSN) that marks a product K-12 for them.

The contact information for this software developer is:

Meg Chesley  
President  
Water Walkers, Inc. DBA Health-e Pro  
P.O. Box 124  
Anacortes, WA 98221  
Phone:(800) 838-4856 x 101  
Fax: (877)355-6405  
E-mail: [meg@healthepro.com](mailto:meg@healthepro.com)  
Website: [www.healthepro.com](http://www.healthepro.com)

As part of the FNS contractor's CNDB modernization research, another software developer, ARAMARK, was interviewed on November 18, 2019. Aramark confirmed that the CNDB is adequate for their school software. This software developer also stated that it would be good to have updates more frequently than once per year. Aramark said if the CNDB adds additional information, like other nutrients and allergen information, as well as being updated more often, then it would be more useful for their other divisions like health care, etc.

The contact information for this developer is:

Lorelei Boyle  
IT Project Lead | Information Technology  
Aramark  
2400 Market Street  
Philadelphia, PA 19103  
Phone: 215-409-7516  
E-mail: [Boyle-Lorelei@aramark.com](mailto:Boyle-Lorelei@aramark.com)  
Website: [www.aramark.com](http://www.aramark.com)

Many food manufacturers have expressed an interest in obtaining the data more frequently or receiving data from other sources, such as GS1, an international association working toward the implementation of global product standards. They have also asked for a way to streamline the process of providing their data rather than entering the data on a spreadsheet.

Software developers have also provided similar input on the frequency of data collection, as well as the format of the database. FNS continues to be receptive to suggestions and research the options available to assist food manufacturers in this process.

**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.**

There is no payment or gift provided to respondents.

**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. No confidential information is associated with this collection of information, nor does the collection request any Personally Identifiable Information (PII); therefore, this information collection does not require a System of Records Notice (SORN) under the Privacy Act. This ICR package was submitted to the FNS Privacy Officer for review. On January 21, 2021, the FNS Privacy Officer indicated that there were no privacy-related concerns for this information collection. This determination was based on the fact that since FNS-710 does not collect Personally Identifiable Information (PII), which would then be used to routinely retrieve

records that contain it, the records and information collection are not subject to the Privacy Act of 1974.

The spreadsheet versions of the FNS-710 submitted by food manufactures are stored on the FNS PartnerWeb (SharePoint) site in a NTAB CNDB subcommunity of this PartnerWeb site, accessible only to FNS and the current CNDB contractor staff working on the CNDB. The spreadsheets are also stored on the FNS internal shared drive with other CNDB data and documentation. Access to the PartnerWeb site must be granted by FNS, Child Nutrition Programs, Nutrition and Technical Assistance Branch staff

**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.**

There are no questions of a sensitive nature included in this information collection.

**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.**

This is a revision of the currently approved collection. With this revision, FNS estimates that this collection will have 32 respondents, 32 annual responses, and 2,240 annual burden hours. The definition for the frequency of response was changed, which in turn adjusted the annual responses and the hours per response for this collection. Previously the frequency of response was defined as each food item reported, for a total of 1,120 responses, divided by the 32 respondents, for a frequency of 35. The hours per response represented the amount of time to report one food item (n=2 hours). The current burden defines the frequency of response as the number of times a manufacturer responds per year (1), with the estimated time per response adjusted to the estimated number of food items submitted per manufacturer [35] X 2 hours per food item, for a new estimated time of 70 hours. Despite the change in the estimated time per response, the total burden hours for the collection remain the same at 2,240 annual burden hours.

Based on internal testing of FNS-710, and conversations with the contractor, the average time needed to provide the requested information on form FNS-710 is estimated to be not more than two hours per response for the FNS-710. However, this estimated time per food item may vary (up to a maximum of two hours) by manufacturer depending on the existing format of the required information.

**Affected Public:** Business or other for-profit (Manufacturers of food produced for schools)

**Estimated Number of Respondents:** The total estimated number of respondents is 32.

**Estimated Number of Responses per Respondent:** The estimated number of responses per respondent is 1. Respondents will provide new and updated data on an annual basis.

**Estimated Total Annual Responses:** 32

**Estimated Time per Response:** The estimated time per response 70.0 hours, which represents 2 hours each for an average of 35 food items, and includes time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

**Estimated Total Annual Burden on Respondents:** The estimated total annual burden on respondents is 2,240 hours. See the table below for estimated total annual burden for each type of respondent.

<b>Respondent Category</b>	<b>Type of respondents (optional)</b>	<b>Instruments</b>	<b>Form</b>	<b>Number of respondents</b>	<b>Frequency of response</b>	<b>Total Annual responses</b>	<b>Hours per response</b>	<b>Annual burden (hours)</b>
Business (or other for profit)	Manufacturers of food produced for schools	CN Database Qualification Report (spreadsheet)	FNS-710	32	1	32	70	2,240.0
	<b>TOTAL</b>			<b>32</b>	<b>1</b>	<b>32</b>	<b>70</b>	<b>2,240</b>

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

Based on prior submissions, the respondents who report the required information are typically from a variety of occupations, including data entry specialists, dietitians or nutritionists, and sales/marketing managers. 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 ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)). The total cost estimate was updated with the 2017 ICR package submission to use more representative occupations because it was determined that the occupation used in the previous submission, State agency and local education agency staff, was not the correct type of occupation. The mean hourly wage was

calculated using an average of the mean hourly wage rates for the three types of occupations discussed above:

Data Entry Keyers; Occupational Code 43-9021 = \$ 16.74 per hour

Dietitians and Nutritionists; Occupational Code 29-1031 = \$29.97 per hour

Marketing and Sales Managers; Occupational Code 11-2020 = \$69.55 per hour.

The average hourly wage of these three representative occupations is \$38.75.

Total Average Wage - 2,240 hours total burden X \$38.75/hour = \$86,800

Additional 33% for fringe/fully-loaded rates - \$86,800 X .33 = \$28,644

TOTAL COST TO PUBLIC = 2,240 hours total burden X \$38.75/hour + \$28,644 (fringe) = \$115,444.

#### **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 data collection for respondents.

#### **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 annual cost to the government for this collection is \$285,473. The Federal government is contracting out the collection of information for and the maintenance of the CNDB. The cost for FY21 for the Child Nutrition Database Operations and Maintenance Base Year for the period of performance 9/28/2020-9/27/2021 is \$210,556.10. The cost is expected to go up

each year based on established wage increases on contract schedules.

This information collection also assumes that a total of 320 hours of Federal employee time per employee for three employees (for a total of 960 hours) for a GS-13, step 2 nutritionist at \$51.34 per hour for a total of \$49,286.40 on an annual basis. It also assumes 100 hours of Branch Chief oversight for a GS-14, step 7 at \$70.45 per hour for a total of \$7,045 on an annual basis. The total for the four Federal employees plus 33% for the fully-loaded (fringe benefits) rate is: \$74,916.76. The three GS-13 employees work with the database contractor to provide oversight and coordination of the data collection process and compilation of the CNDB. The FNS staff review data collected, assist with answering questions from food manufacturers and software developers, assist the contractor with the process of data collection and compilation of the CNDB, attend biweekly meetings with the contractor, review and provide feedback on the annual CNDB release, update the FNS-710, and coordinate approval of the ICR process. The Branch Chief attends meetings with the contractor, FNS staff, and contract staff to ensure the work is done according to the Performance Work Statement of the contract. The Branch Chief also reviews meeting minutes, correspondence, and reports related to the FNS-710 ICR and the compilation of the CNDB. Federal employee pay rates are based on the 2021 General Schedule of the Office of Personnel Management (OPM) for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area with 33% added to account for the fully-loaded rate (fringe benefits).

**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 information collection is currently approved with 2,240 burden hours and 1,120 responses. For this revision, FNS changed the definition of the frequency of the responses per respondent. Previously, the frequency of response was defined as each food item reported, so 32 respondents submitted responses 35 times, for a total of 1,120 responses. For this revision, the frequency of response per respondent has been adjusted to the number of times a manufacturer responds per year, so 32 respondents respond once per year, for a total of 32 responses. The estimated time per response has also changed. Previously, FNS estimated that it was the time that it took a food manufacturer to report one food item, which FNS estimated would take 2 hours. With this revision, FNS has adjusted the estimated time per response to represent the estimated number of food items per manufacturer [35] X 2 hours per food item, for an estimated time per response of 70 hours. Although, the estimated time per response has changed, it does not change the total burden hours, which remain at 2,240 burden hours. FNS estimates that the number of responses for this collection will decrease by 1,088 responses per year due to an adjustment. With this revision, FNS estimates that this collection will have 32 responses and 2,240 burden hours.

**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.**

The data collected are expected to be released annually as part of the CNDB in acceptable file formats that are acceptable to the developers of the USDA-approved nutrient analysis



software. One format will be published on the FNS Team Nutrition website: <https://www.fns.usda.gov/tn/child-nutrition-database>. Additional formats are available to software developers on the CNP Approved Nutrition Software PartnerWeb (SharePoint) site. For CN23 in 2020, the database was made available in CSV, JSON, XML, MSSQL, MySQL, Excel, and text comma delimited formats. These additional formats are also available to other users upon request. The database is downloaded by software vendors who use it as part of their USDA-approved nutrient analysis software to be used in the weekly planning and assessment of Child Nutrition Program meals by State Agencies and NSLP and SBP participants (schools). Currently, the CNDB is expected to be updated and published annually until the modernization efforts allow more frequent updates or such time as it no longer serves a purpose for the Child Nutrition Programs.

**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."**

The agency can certify compliance with all provisions under Item 19 of OMB Form 83-1.