

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-NEW**

**Study of Nutrition and Activity in Child Care Settings II (SNACS-II)**

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

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

The Child and Adult Care Food Program (CACFP), administered by the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS), provides reimbursement for nutritious meals and snacks served to eligible children enrolled in participating child care programs. To be eligible for reimbursement, meals and snacks must meet CACFP's meal pattern requirements.

The Study of Nutrition and Activity in Child Care Settings (SNACS-I; OMB Number 0584-0615, expired 10/31/2019), which collected data in program year (PY) 2016–2017, was the first comprehensive, nationally representative assessment of child care providers participating in the CACFP and the infants and children they serve. Updated meal pattern requirements, which specify the types and amounts of food that must be offered in CACFP meals and snacks, went into effect shortly after data collection for SNACS-I was complete. Under the updated requirements, CACFP meals and snacks must include a wider variety of fruits and vegetables, more whole grains, and less added sugar and saturated fat. The updated requirements were also designed to encourage breastfeeding.

SNACS-II will collect data in PY 2022–2023 to update the picture of CACFP several years after the new meal patterns went into effect. SNACS-II will largely replicate the methods used in SNACS-I, and comparing key outcomes at the two points in time is an important focus of the study. SNACS-II expands child-level data collection into family day care homes (FDCHs).

Section 28(a) of the Richard B. Russell National School Lunch Act (NSLA; Appendix A) authorizes the USDA Secretary to conduct performance assessments of CACFP, including the nutritional quality of the meals and the cost of producing them. Under Section 28(c), entities participating in CACFP shall cooperate in the conduct of evaluations and studies.

## **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.**

### **A.2.A. How the information is to be used**

This is a new information collection request. FNS will use SNACS-II to conduct a performance assessment of CACFP. As a follow-up to SNACS-I, which provided FNS with comprehensive information about CACFP operations in child care settings, SNACS-II is a voluntary collection that will collect nationally representative data addressing over 70 research questions organized around eight distinct research objectives:

<b>Objective 1</b>	Describe the characteristics of CACFP providers; the CACFP environment; providers' menu planning, meal purchasing, and food service practices; and providers' wellness policies and practices.
<b>Objective 2</b>	Determine the food, calorie, and nutrient content of CACFP meals and snacks and the overall nutritional quality of these meals and snacks.
<b>Objective 3a</b>	Describe children's usual food, calorie, and nutrient intake during child care days and non-child care days.
<b>Objective 3b</b>	Describe characteristics of children and their families, including children's body mass index (BMI), household food security, and participation in food assistance programs.
<b>Objective 3c</b>	Describe characteristics of teens (ages 10 to 18) who participate in the CACFP through before- and after-school programs, and the food content of meals and snacks offered to teens in these settings.
<b>Objective 4</b>	Assess and describe plate waste in the CACFP.
<b>Objective 5</b>	Examine infant feeding practices, infant food intake, and infants' activity levels while in child care.
<b>Objective 6</b>	Determine the cost of producing an average CACFP breakfast, lunch, supper, and snack.

In addition to addressing the above research objectives, SNACS-II will also examine how key outcomes have changed since PY 2016–2017, when SNACS-I was conducted, and the selected relationships between key outcomes. For example, multivariate modeling will be used to examine the relationship between provider characteristics (including characteristics of the food and physical activity environments) and key outcomes such as the nutritional quality of CACFP meals and snacks and levels of plate waste. At the conclusion of the study, a summary of findings will be made available to the general public. The planned approach for SNACS-II largely mirrors the approach used in SNACS-I, with some adjustments (1) in data collection

mode to enhance data quality and (2) to meet the particular goals of SNACS-II by maximizing response rates and enhancing instrument content. Because SNACS-I and -II comparisons are so important, the planned adjustments have been carefully considered to ensure they will not compromise the validity of these comparisons.

**A.2.B. From whom the information will be collected**

SNACS-II sampling plan is designed to provide nationally representative samples of CACFP providers; children, teens, and infants served by CACFP providers; and CACFP meals and snacks for PY 2022–2023. The SNACS-II study design builds on the SNACS-I design to ensure comparability of estimates across the two studies and provide required levels of statistical precision, while minimizing data collection costs and respondent burden. In addition, the SNACS-II design addresses specific challenges faced in SNACS-I. Table A-1 below describes the purpose of all planned data collection activities by the type and number of respondents.

**Table A-1. Overview of Data Collection Activities**

Respondent Type	Number of Respondents <sup>a</sup>	Purpose of Data Collection Activities
State Agency Managers	25	- States will submit CACFP provider lists that will be used for sampling.
Sponsor Program Staff	1,178	- Will not be formally sampled. For sponsored providers, we will contact sponsors to gain their cooperation before contacting any providers. - A subset of sponsors will also participate in cost interviews to gather information on key characteristics of the sponsor agency, such as where meals are produced, and how food is transported and by whom. These details will provide context to help tailor subsequent data collection activities (Objective 6)
Provider/Directors	1,340	- Will complete a web-based survey collecting information on a variety of topics related to CACFP food service operations, infant feeding practices, and physical activity in child care settings (Objective 1). - Will participate in cost interviews to collect data on the time allocation and compensation of center staff who do not work primarily on food service but support the CACFP. These staff may include teachers or aides who help with meal service (Objective 6).
Food preparers	1,340	- Will complete a survey collecting information on the foods and beverages served in each meal and snack for one week, referred to as the target week (Objective 2). - Providers with enrolled infants will complete a similar survey on foods served by specific times of day for infants (Objective 5).
Provider staff	139	- Teachers or caregivers of sampled infants will record the types of foods and beverages consumed at each feeding while the infant is in care (Objective 3).



Respondent Type	Number of Respondents <sup>a</sup>	Purpose of Data Collection Activities
Parents/ Guardians of Children	2,160	- Will participate in interview to collect information on parent demographics, child and family characteristics, as well as the child's food, activity, and child care schedule (Objective 3b) - Will participate in interviewer-administered dietary recall interview to collect information on their children's dietary intake (Objective 3a).
Parents/ Guardians of Teens	411	- Will participate in interview that collects information on participation in nutrition assistance and other support programs, and sociodemographic characteristics (Objective 3c).
Parents/ Guardians of Infants	597	- Will be asked to provide their infants weight and date of birth (Objective 5).
Child	2,160	- Trained data collectors will take height and weight measurements for each child age 2 and older (Objective 3b).
Teen	960	- Will complete a survey collecting information on the physical and sedentary activities and food security status of youth age 10 to 18 years (Objective 3c).

<sup>a</sup> Number of respondents expected to complete a data collection activity.

### A.2.C. How the information will be collected

Appendix B details the SNACS-II data collection activities (including the data collection mode and changes to instruments since SNACS-I), which are also summarized briefly below.

Appendices C, D, and G include recruiting materials; and Appendices E, F, and H include instruments and contact materials. The appendices for FDCH operators, parents, and teens that are available in both English and Spanish are listed below, with a slash denoting the two corresponding versions.

- FNS Regional Offices will notify sampled States of the study (Appendix C1), then recruiters will send study information and recruit the States to participate (Appendices C2 through C4 and D1/D2). States will submit CACFP provider lists to be used for sampling.<sup>1</sup>
- Recruiters will notify sponsors of their providers sampled for the study, and sponsors will be asked for their endorsement (Appendices C5 through C18 and D1/D2). Sponsors with providers in the cost study will also be asked to participate in data collection (Appendices E1, E2, and E4).
- Recruiters will notify sampled providers of the study and recruit them to participate (Appendices C5 through C10, C17 through C28, and D1/D2). All providers will be asked to

<sup>1</sup> Sampling plans are described in Section B.1 in Supporting Statement Part B.

complete the web-based Provider Survey (Appendices F1 through F8); instrument screenshots are in Appendices F9/F10. All providers will also be asked to complete the hardcopy Menu Survey (Appendices F11 through F14), and those with enrolled infants will be asked to complete the hardcopy Infant Menu Survey (Appendices F15/F16).

- Three subsamples of providers will each participate in one of three kinds of onsite data collection activities: child only, cost only, and child and cost.
  - Providers in the child-only subsample will submit rosters of the children in their care for sampling, help recruit parents and get their consent, and plan for and facilitate the data collection visit (Appendices C25 through C32). Provider staff who care for sampled infants will complete the Infant Intake Form (Appendices F17/F18). Trained data collectors will observe the classroom environment (Environmental Observation Form, Appendix F19) and CACFP meals and snacks (Meal Observation Booklet, Appendix F20).
  - Center directors of providers in the cost-only subsample will complete the Pre-Visit Cost Telephone Interview and the Pre-Visit Cost Form, which includes submitting CACFP financial statements to help plan the data collection visit (Appendices E1 and E2). They will be sent a Self-Administered Cost Questionnaire to complete before the visit (Appendix E3). Trained data collectors will review this questionnaire with center directors and also conduct the Sponsor/Center Cost Interview and Center Director Cost Interview (Appendices E4 and E5). Food preparers will also complete a Center Food Service Cost Interview (Appendix E6).
  - Providers in the child-and-cost subsample will complete all the activities described in the above two bullet points.
- All parents or guardians will receive recruitment packages, be asked to provide written consent,

and participate in different data collection activities depending on their child's age:

- Parents or guardians of infants (ages birth to 11 months) will receive study information and consent to participate (Appendices G1 through G12 and D1/D2).
- Parents or guardians of children (ages 1 to 12) will receive study information and consent to participate (Appendices G3/G4, G7/G8, G13 through G20, and D1/D2). They will be asked to complete the In-Care Day Parent Interview (Appendices H1 through H4), which includes the Automated Self-Administered 24-Hour (ASA24) dietary recall interview, while using the Child Food Diary and Food Model Booklet (FMB) (Appendices H5 through H10). They will also be asked to complete the Parent Interview for ASA24 Only for an outside-of-care day using the Child Food Diary and FMB (Appendices H5 through H12). Independent subsamples of parents will be asked to complete a third Parent Interview for ASA24 Only for either an additional in-care or outside-of-care day, again using the Child Food Diary and FMB (Appendices H5 through H12).
- Parents/guardians of teens (age 10 to 18 years) will receive study information and consent to participate (Appendices G3/G4, G7/G8, G21 through G28, and D1/D2). They will be asked to complete the Teen Parent Interview (Appendices H1/H2 and H13/H14).
- Trained data collectors will measure the height and weight of sampled children (ages 1 to 12) during the data collection visits to providers in the child-only and child-and-cost subsamples (Child Height and Weight Form, Appendix H15), and will observe the children's meal and snack intake (Meal Observation Booklet, Appendix F20).
- Teens (ages 10 to 18) whose providers are in the child-only and child-and-cost subsamples will receive study information (Appendices D1/D2). Trained data collectors will administer a hardcopy Food and Physical Activity Experiences survey to them during data collection visits

(Appendices F21/F22).

**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.**

In compliance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce the burden on respondents. The Provider Survey (Appendices F7/F8) will be web-based, and the Parent Interviews (Appendices H3/H4 and H11 through H14) will be administered using computer-assisted interviewing to efficiently collect complete and accurate data while minimizing respondent burden. The computer-driven routing will prevent respondents from mistakenly answering non-applicable questions or skipping questions. Of the 44,176 responses for this collection, 8,554 (19 percent) will be collected electronically.

**A4. Efforts to identify duplication.**

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

There is currently no similar information collection. Every effort has been made to avoid duplication. The information collected from SNACS-I was found to be unique and necessary data, and SNACS-II will update and expand on it. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies, and found that none provide the necessary data.

**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.**

Smaller child care centers and FDCHs are involved in this data collection effort, but they

deliver the same program benefits and perform the same functions as any other child care center, and they maintain the same type of information on file that larger entities do. According to data from the U.S. Census Bureau's Statistics of U.S. Businesses, 99.9 percent of child care centers and FDCHs are small businesses, accounting for approximately 6,869 respondents, 35 percent of the total sample for SNACS-II. Their participation is necessary to meet the study objectives. The information being requested is the minimum required for the intended use. We will minimize burden by restricting the length of surveys and interviews as much as possible, conducting data collection at times that are convenient to the respondent, and administering the Provider Survey on the web.

**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.**

Data for this proposed study will only be collected once. Without this information, FNS will not be able to assess how CACFP operations have changed since the updated meal pattern requirements went into effect. SNACS-II will look at the nutrition and wellness policies and activities in child care centers, family child care homes, and before and after school programs across the country. This important study will help child care providers and the USDA understand how the CACFP operates so that it can better help children learn and grow. Without conducting this study FNS will not be able to see how meal operations have changed since the new meal patterns, or understand the changes in the nutritional quality, child care environment and costs of CACFP operations since the updated meal pattern requirements. There is no other study comparable to this study.

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

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

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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

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

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

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

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

##### **A.8.A. Federal Register Notice and comments**

A notice of the proposed information collection and an invitation for public comment were published in the *Federal Register* on February 18, 2021 (Vol. 86, No. 31, pages 10163-10168). FNS

received 2 comments before the public comment period ended on April 19, 2021. Germane public comments are in Appendix I, and responses to the comments are in Appendix J. The two comments were about objections because the study will waste taxpayer dollars. The responses described how the study results will be used to make the CACFP more efficient and that they are needed for responsible program administration. The comments do not point to any specific change needed, and thus no changes were made to the study in response.

**A.8.B. Consultations outside of the agency**

Consultations about the instruments, recruiting procedures, and data collection procedures began during the study’s design phase and will continue to take place throughout the study. FNS consulted with Mingshan Zheng from the National Agricultural Statistics Service (NASS) for expert consultation on the study design and methodology. NASS comments are in Appendix K. Additionally, the following individuals outside the agency reviewed and commented on the study plan:

Name	Degree	Title	Organization	Phone number
Catherine Stafford	B.S. in community dietetics, San Jose State University	Child health and nutrition manager	CocoKids	(925) 899-5885
Susan Hooker	M.S. in education, Alfred University	Executive Director	Concern for Youth	(607) 324-0808
Geri Henchy <sup>a</sup>	MPH-Nutrition, University of California Berkeley	Director of Nutrition Policy	Food Research and Action Center (FRAC)	(202) 986-2200

<sup>a</sup>Did not receive a response

The external reviewers provided feedback on data collection plans and instruments. They complimented the study design and procedures overall, and the study team incorporated their feedback into the instruments before conducting the pretest (see Section B.4). The revisions were minor. For example, the instructions for the Infant Intake Form (Appendices F17/F18) now advise respondents to fill out the form throughout the day to improve accuracy, and the menu example in the Infant Menu Survey (Appendices F15/F16) is better aligned with the CACFP meal pattern requirements.

**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.**

FNS is requesting incentives for providers with onsite data collection; food preparers; teachers or caregivers of infants; parents or guardians; and teens (Table A.9.1). In addition to incentives, other efforts to reduce nonresponse bias and improve response rates include a study website, user-friendly recruitment materials, endorsements, and a specialized recruitment team (see Section B.3).

Except for the incentives proposed for teachers or caregivers of infants and for teens, all incentives will be in the form of a gift card to the respondent after an interview or activity is completed. Monetary incentives reduce nonresponse bias and improve the representativeness of the survey,<sup>2</sup> and the proposed incentives are part of a suite of planned strategies to minimize bias and the time needed to accrue completes, without affecting data quality.<sup>3</sup> Table A.9.1 provides a summary of the calculations for the incentive amounts.

**Table A.9.1. Summary of Incentive Calculations**

Respondent	Activity (Appendices)	Calculation <sup>1,2</sup>	Estimated Cost	Value of Proposed Incentive
<b>CACFP Provider</b>	Recruitment (C17—C28)	N/A	N/A	\$10.00
<b>Food Preparer</b>	Menu Survey (and Infant Menu Survey, if applicable) (F11/F12 and F15/F16)	Average hourly cost for a babysitter is \$17.50 per hour x 4 hours <sup>3</sup> and cost of purchasing meal estimated at \$10 more than preparing at home <sup>4,5</sup>	\$80.00	\$50.00
<b>Teacher/Caregiver of Infant</b>	Infant Intake Form (F17/F18)	Average hourly wage for teacher/caregiver: \$17.13 x 0.67 hours	\$11.48	\$5.00 per infant

<sup>2</sup> Singer, E., and Ye, C. (2013). The use and effects of incentives in surveys. *Annals of the American Academy of Political and Social Science*, 645(1): 112-141.

<sup>3</sup> Singer, E. (2006). Introduction: Nonresponse Bias in Household Surveys. *Public Opinion Quarterly*, 70(5): 637-645.



Respondent	Activity (Appendices)	Calculation <sup>1,2</sup>	Estimated Cost	Value of Proposed Incentive
<b>Parent/Guardian of Infants, Children, or Teens</b>	Parent Consent and Permission Form (G5/G6, G15/G16, or G23/G24)	Average hourly wage for parent/guardian: \$36.00 x 0.167 hours = \$6.01  Average hourly cost for a babysitter is \$17.50 per hour x 0.167 hours <sup>3</sup> Cell phone and data usage: \$0.10 standard rate per minute for pay-as-you-go phones x 10 minutes = \$1.00	\$9.93	\$2.00
<b>Parent/Guardian of Children</b>	Parent Interview for In-Care Day (includes ASA24 & Child Food Diary) (H3—H10)	Average hourly wage for parent/guardian: \$36.00 x 0.9838 hours = \$35.42  Average hourly cost for a babysitter is \$17.50 per hour x 0.9504 hours <sup>3</sup> Cell phone and data usage: \$0.10 standard rate per minute for pay-as-you-go phones x 45 minutes = \$4.50	\$56.55	\$20.00
<b>Parent/Guardian of Children</b>	Parent Interview for Out-of-Care Day (ASA24 & Child Food Diary only) (H5—H12)	Average hourly wage for parent/guardian: \$36.00 x 0.6670 hours = \$24.01  Average hourly cost for a babysitter is \$17.50 per hour x 0.7004 hours <sup>3</sup> Cell phone and data usage: \$0.10 standard rate per minute for pay-as-you-go phones x 30 minutes = \$3.00	\$39.27	\$30.00
<b>Parent/Guardian of Children</b>	Parent Interview for In- or Out-of-Care Day (ASA24 & Child Food Diary only, for usual intake subsamples) (H5 – H12)	Average hourly wage for parent/guardian: \$36.00 x 0.6670 hours = \$24.01  Average hourly cost for a babysitter is \$17.50 per hour x 0.7004 hours <sup>3</sup> Cell phone and data usage: \$0.10 standard rate per minute for pay-as-you-go phones x 30 minutes = \$3.00	\$39.27	\$30.00
<b>Parent/Guardian of Teens</b>	Parent Interview for Teen Sample (H13/H14)	Average hourly wage for parent/guardian: \$36.00 x .2004 hours <sup>2</sup> = \$7.21  Average hourly cost for a babysitter is \$17.50 per hour x 0.2004 hours <sup>3</sup> Cell phone and data usage: \$0.10 standard rate per minute for pay-as-you-go phones x 10 minutes = \$1.00	\$11.71	\$10.00
<b>Youth</b>	Food and Physical Activity Experiences Survey (F21/F22)	N/A	N/A	\$5.00

<sup>1</sup>Average hourly wage rates used included, Directors (Directors, Religious Activities and Education) - \$25.32, Food Preparers (Food Preparation and Serving Related Occupations) - \$13.41, Provider Staff (Childcare Workers) - \$12.88, Parents (all occupations) - \$27.07. Teens were assumed to not have an hourly wage rate. Average hourly rates are taken from: Bureau of Labor Statistics, Wages by Occupation, May 2020. All average wage rates are multiplied by 1.33 in the table above to represent fully loaded wages.

<sup>2</sup>Estimated respondent burden hours are provided in Appendix N.

<sup>3</sup>SitterCity. "How Much Should You Pay Your Babysitter or Nanny?" June 2019. Available at <https://www.sittercity.com/parents/using-sittercity/how-much-should-you-pay-your-sitter-or-nanny>. Accessed October 19, 2020.

<sup>4</sup>Money Under 30. "The True Cost of Eating Out (And How to Save)." October 2019. Available at <https://www.moneyunder30.com/the-true-cost-of-eating-in-restaurants-and-how-to-save>. Accessed October 19, 2020.

<sup>5</sup>Forbes. "Here's How Much Money You Save By Cooking At Home." July 2018. Available at <https://www.forbes.com/sites/priceconomics/2018/07/10/heres-how-much-money-do-you-save-by-cooking-at-home/#74bc852235e5>. Accessed October 19, 2020.

Twenty-five percent of providers recruited for SNACS-I did not complete data collection, often because they refused to after initially agreeing to participate. Consequently, considerable effort was devoted to recruiting replacement providers and the study ultimately fell short of its completion targets.<sup>4</sup> We therefore propose a \$10 post-recruitment incentive to encourage providers with on-site data collection to continue cooperating with data collection.<sup>5</sup>

Consistent with SNACS-I, FNS proposes to offer a financial incentive to food preparers for completing a detailed Menu Survey (and Infant Menu Survey, if applicable) (Appendices F11/F12, F15/F16) for the selected child care week. The Menu Survey and Infant Menu Survey are estimated to take up to 4 hours to complete over five consecutive days (up to 2.33 hours for the former and 1.67 hours for the latter), which means food preparers will need to take time outside their normal working hours to respond to them. The incentive amounts can help to offset the financial burden that many respondents will incur as a result of participation, such as child care that may be needed for food preparers to complete the survey during non-working hours, as well as the opportunity cost of potentially needing to purchase rather than prepare meals for themselves or household members due to time spent completing the information request. The total incentive would offset approximately 1.5 hours of child care and two purchased meals for an average household with 0.57 children in 2019.<sup>6</sup>

The incentive payment is designed to improve data quality by encouraging food preparers to provide complete data in these critical instruments. Without complete data from the Menu and

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<sup>4</sup> Logan, C., LeClair, L., Baugher, M., and Rodriguez, B. (2018). Summary memorandum on recruitment into the study of nutrition and wellness quality in child care settings (SNACS). Submitted to FNS.

<sup>5</sup> Groves, R.M., Cialdini, R.B., and Couper, M.P. (1992). Understanding the decision to participate in a survey. *Public Opinion Quarterly*, 56: 475–495.

<sup>6</sup> United States Census Bureau. "Average Population Per Household and Family." November 2019. Available at <https://www.census.gov/data/tables/time-series/demo/families/households.html>. Accessed October 19, 2020.

Infant Menu Surveys, we will not be able to answer many of the study research questions about the food and nutrient content of CACFP meals and snacks, the costs to produce them, and children’s dietary intakes while in care.

Infants’ teachers or caregivers are the sole source of infant intake data for the study, and an insufficient number of completes will limit generalizability. Because staff rotate through the infant room throughout the day, more than one caregiver might need to contribute to completing each form. Dividing gift cards among staff is not practical. We therefore propose an incentive valued at \$5 for each completed Infant Intake Form (Appendices F17/F18) in the form of age- and culturally appropriate children’s books for the classroom. OMB approved a similar incentive for The Early Head Start Family and Child Experiences Survey (Baby FACES)-2020 (OMB Number 0970-0354; expires 10/31/2021). The Baby FACES study team reported that the infant caregivers enjoyed choosing from a selection of books.

Based on experiences from SNACS-I, we anticipate challenges recruiting parents or guardians of infants, children, and teens to complete the consent and permission form (Appendices G5/G6, G15/G16, or G23/G24) so that their children can participate in the study. Therefore, we propose to include a prepaid incentive, in the form of a \$2 bill, to be enclosed with the form to encourage completion of the consent and permission form and participation in the study. All parents will receive the prepaid incentive, regardless of their decision to participate.

A substantial amount of literature documents the effectiveness of prepaid incentives.<sup>7</sup>

Cantor, O’Hare, and O’Connor<sup>8</sup> reviewed incentive experiments in telephone surveys and found

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<sup>7</sup> Singer, E., van Hoewyk, J., and Maher, M. P. (2000). Experiments with incentives in telephone surveys. *Public Opinion Quarterly*, 64, 171–188; and Singer, E., Groves, R. M., and Corning, A. D. (1999). Differential incentives: Beliefs about practices, perceptions of equity, and effects on survey participation. *Public Opinion Quarterly*, 63, 251–260.

<sup>8</sup> Cantor, D., O’Hare, B., & O’Connor, K. (2008). The use of monetary incentives to reduce nonresponse in random digit dial telephone surveys. In *Advances in Telephone Survey Methodology*, edited by Lepkowski, J., Tucker, C., Brick, J.M., de Leeuw, E., Japac, L., Lavrakas, P., Link, M., & Sangster, R.. Hoboken, NJ: Wiley & Sons Publishing.

consistently significant effects for prepaid incentives of \$1 to \$5, with increases in response rate of 2.2 to 12.1 percentage points.<sup>9</sup> A recent experiment conducted by FNS for the SNAP Barriers Study (OMB Number 0584-0631; expired 12/31/20) found that a \$2 pre-incentive increased the response rate by 5.8 percentage points.<sup>10</sup> Another recent FNS study, Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants (FMCS; OMB Number 0584-0564; expired 10/31/15), included an incentive experiment to examine the impact of a differential incentive on survey completion rates among SNAP participants. Survey response rates were highest for the group receiving a \$5 initial (pre-paid or pre-survey) incentive. Messer and Dillman<sup>11</sup> in their meta-analysis found a significant increase in response rates on multi-mode surveys when offering a \$5 pre-incentive.

Based on the available evidence, the proposed prepaid incentive should bolster the number of parents or guardians completing the consent and permission form, thereby decreasing nonresponse bias, improving representativeness, and reducing the time to reach the target number of completes. The proposed prepaid incentive should also help offset the costs parents or guardians may face to complete the consent and permission form, such as time away from work, child care needed to review and complete the consent and permission form, and cell phone costs for calls to the study help line with questions or concerns.

For parents or guardians that complete the consent and permission form and are sampled for participation in the study, parents or guardians of children ages 1 to 12 will be asked to participate in up to three telephone interviews (Appendices H1 through H12)<sup>12</sup>. Parents or

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<sup>9</sup> Cantor, D., O'Hare, B., & O'Connor, K. (2008).

<sup>10</sup> Gearing, Maeve. 2017. Assessment of the Barriers that Constrain the Adequacy of Supplemental Nutrition Assistance Program (SNAP) Allotments: Results of Incentive Experiment. Memo submitted to FNS.

<sup>11</sup> Messer, B. and Dillman, D. (2011). Surveying the general public over the internet using address-based sampling and mail contact procedures. *Public Opinion Quarterly*: 64: 171-188.

<sup>12</sup> Most parents will complete two interviews. A subsample will be asked to complete a third interview.

guardians of teens will complete one telephone interview (Appendices H13/H14). The proposed incentive amounts for the Parent Interviews are based on burden to the participant, experiences from other recent FNS studies with interviews of parents of children in child care,<sup>13</sup> and evidence from previous studies with similar respondents and incentive amounts. This evidence suggests that nonresponse bias will be higher without the planned incentives, resulting in a lower quality of data and a decreased likelihood of enough participants successfully answering all the study research questions. Given the time and effort required, incentives will be essential for minimizing nonresponse and ensuring that there are non-meaningful differences between respondents and nonrespondents. The incentive amounts can help to offset the financial burden that many parents will incur as a result of participation, such as taking time out of their regular work hours, child care that may be needed for parents to complete the survey (if completed outside of work hours) and cell phone costs for calls with interviewers. Incentives also improve response rates, which helps to ensure there are enough completed surveys to detect statistically significant differences. OMB approved a \$25 post-pay incentive for respondents who completed the web-based Parent Survey for the Project LAUNCH Cross-Site Evaluation (OMB Number 0970-0373, expired 10/31/2019) after data collection had started and it was found that early respondents were not representative of their communities. Minorities, individuals with lower incomes and education levels, and those who worked part time or were unemployed were underrepresented. Both completion rates and representativeness improved after the incentives were provided.<sup>14</sup>

#### The Head Start Family and Child Experiences Survey (FACES 2014-2018; OMB

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<sup>13</sup> The incentive amounts are consistent with the amounts paid in SNACS-I and the Erroneous Payments in Child Care Study (EPICCS) (OMB Number 0584-0618, expired 01/31/2020).

<sup>14</sup> Lafauve, K., Rowan, K. Koeppe, K., & Lawrence, G.. (2018). Effect of incentives on reducing response bias in a web survey of parents. Presented at the American Association of Public Opinion Research Annual Conference: Denver, CO, May 16-19.

Number 0970-0151, expired 02/28/2018), tried a tiered incentive for the parent survey, lowering amounts relative to the prior FACES study to \$15 as a base (with add-ons for a potential of \$25 total), and saw lower response rates than seen in previous studies. In another study, a \$10 incentive was found to increase responses by 20 percentage points among Medicaid recipients,<sup>15</sup> a low-income population similar to the SNACS-II target population.

Experiments testing the use of incentives in telephone surveys of adults support the use of a post-pay incentive to improve response rates.<sup>16,17,18</sup> Brick et al. (2007) observed a dramatic effect in their experiment comparing \$10 and \$5 incentives. The response rate for the \$10 group was 26 percent, compared to 19 percent for the \$5 group. In their 2015 meta-analysis of monetary incentives and response rates in household surveys, Mercer et al. (2015) noted the variability in the effectiveness of incentives across experiments. However, across the studies included in the meta-analysis, the authors concluded that promised incentives in the range of \$15 to \$30 could be expected to raise telephone survey response rates by 6 percent to 7 percent, compared to what they would be with no incentives.

FNS also proposes to offer nonmonetary incentives to teens who complete the Food and Physical Activity Experiences Survey (Appendices F21/F22). Because topic salience is a driver of survey participation<sup>19</sup> and teens are unlikely to be motivated by the survey topics to participate, the planned incentives are designed to increase representativeness by encouraging participation among those who have less interest in a study about the CACFP. These incentives,

<sup>15</sup> Fredrickson, D.D., Jones, T.I, Molgaard, C.A., Carman, C.G., Schukman, J., Dismuke, S.E., and E. Ablah (2005). Optimal design features for surveying low-income populations. *Journal of Health Care for the Poor and Underserved*, 16: 677-690.

<sup>16</sup> Brick, J. M., Brick, P.D., Dipko, S., Presser, S., Tucker, C., & Yuan, Y. (2007). Cell phone survey feasibility in the U.S.: Sampling and calling cell numbers versus landline numbers. *Public Opinion Quarterly*, 71(1): 23-39.

<sup>17</sup> Mercer, A., Caporaso, A., Cantor, D., & Townsend, R. (2015). How much gets you how much? Monetary incentives and response rates in household surveys. *Public Opinion Quarterly*, 79(1): 105-129.

<sup>18</sup> Cantor, D., O'Hare, B., & O'Connor, K. (2008). The use of monetary incentives to reduce nonresponse in random digit dial telephone surveys. In *Advances in Telephone Survey Methodology*, edited by Lepkowski, J., Tucker, C., Brick, J.M., de Leeuw, E., Japac, L., Lavrakas, P., Link, M., & Sangster, R.. Hoboken, NJ: Wiley & Sons Publishing.

<sup>19</sup> Groves, R. M., M. P. Couper, S. Presser, E. Singer, R. Tourangeau, G. Acosta, and L. Nelson. (2006). Experiments in Producing Nonresponse Bias. *Public Opinion Quarterly*, 70(5), 720-73.

such as a string backpack or water bottle, will be worth about \$5 each.

Finally, after a provider agrees to participate in the study, the study team will work with the center director or FDCH operator to identify an onsite point-of-contact (POC). Child care staff play an essential role in successfully recruiting parents or guardians, including obtaining consent<sup>20</sup>, and are also critical to coordinating data collection activities at the site. The onsite POC will fill this role by distributing recruitment materials to the parents/guardians of sampled infants, children, and teens, and direct parents/guardians to the study's website, email address, and toll-free number for more information. Onsite POCs will have copies of the parent brochure and the study team will ask onsite POCs to post those copies in prominent locations to raise awareness of the study.

Onsite POCs in FDCHs and child care centers will be offered stipends of \$150 and \$350, respectively, for their critically needed assistance with recruitment, consent, and data collection. Because completing these study-related responsibilities in addition to normal job responsibilities may require time outside of normal working hours, the stipend is designed to offset financial burden such as child care expenses. The smaller proposed incentive for onsite POCs in FDCHs reflects the smaller enrollment and target sample sizes at these sites. POCs' familiarity with staff and families will be imperative for reducing nonresponse bias and completing successful data collection visits. The proposed stipends are similar to the amounts used in SNACS-I and are meant to cover the time POCs will spend assisting with sampling and recruiting parents or guardians; planning data collection visits; and facilitating the visits, including helping data collectors measure children's height and weight and administer surveys to teens.

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<sup>20</sup> Harrington, K. F., D. Binkley, K. D. Reynolds, R. C. Duvall, J. R. Copeland, F. Franklin, and J. Raczynski. "Recruitment Issues in School-Based Research: Lessons Learned from the High 5 Alabama Project." *Journal of School Health*, vol. 67, 1997, pp. 415–421.

**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 study team will comply with all Federal and state laws to protect privacy, including the requirements of the Privacy Act of 1974. Section 9(b) of the NSLA restricts the use or disclosure of any eligibility information to persons directly connected with the administration or enforcement of the program. The study team will adhere to the requirements in the system of record notice, FNS-8 USDA/FNS Studies and Reports, published in the *Federal Register* on April 25, 1991, volume 56, pages 19078–19080. It discusses the terms of protections that must be provided to respondents. FNS Privacy Officer, Miguel Marling, reviewed this package.

The study team will inform respondents that the information they provide will be kept private, and will not be disclosed to anyone except the researchers conducting the study, unless otherwise required by law. Consent or assent forms or disclosure statements will be provided to all respondents, outlining the purpose of the study and how the data will be safeguarded.

Research staff are required to sign a confidentiality agreement (Appendices L1 and L2). Staff pledge to maintain the privacy of all information collected from the respondents and not to disclose it to anyone other than authorized representatives of the study. In training sessions for staff working on the project, there will be a discussion of privacy and obtaining consent and assent. In addition, an Institutional Review Board has reviewed and approved the study procedures, including procedures to ensure respondents' privacy (Appendix M).

All hardcopy forms containing identifying information will be kept in locked areas and shredded at the close of the study. Files containing personally identifiable information will be transferred using a secure file transfer site. Both sources of data will be accessible only by approved contractor staff. Any collected data containing identifying information will be housed



on secure servers. Names and phone numbers will not be linked to participants' responses, each survey respondent will have a unique ID number, and the analysis will be conducted on data sets that include only respondent ID numbers.

The study team uses extensive corporate administrative and security systems to prevent the unauthorized release of personal records, including state-of-the-art hardware and software for encryption that meets Federal standards, and other methods of data protection (for example, requirements for regular password updating). Physical security will include limited key card access and locked data storage areas.

**A11. Justification for any questions of a sensitive nature.**

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

The Child Height and Weight Form, Parent Interviews, and Food and Physical Activity Experiences Survey (Appendices H3/H4, H11 through H14, and F21/F22) include questions of a sensitive nature. FNS Privacy Officer, Miguel Marling, reviewed this package.

The Child Height and Weight Form (Appendix H15) collects measurements on individual children. Height and weight may be considered sensitive information because they are commonly considered private. Parents will be informed of the height and weight assessments during recruitment. Unique identifiers are attached to each form; the child's name is not on the form. This instrument was used successfully in SNACS-I and in the Evaluation of the School Breakfast Pilot Program (OMB Number 0584-0505, expired 03/31/2004). The child's height and weight are needed to answer the following research question: What is the children's weight status (body mass index and percentage overweight and underweight)?

The survey questions in the Parent Interviews (Appendices H3/H4, H11/H12) on the following topics may be considered sensitive items: race and cultural origin; household composition; food security status; total household income; and receipt of public assistance (including FNS nutrition programs). Similar questions have been used successfully with no evidence of harm in SNACS-I and in other studies such as the School Nutrition and Meal Cost (SNMCS) and School Nutrition Dietary Assessment studies; the Access, Participation, Eligibility, and Certification studies; and the Evaluation of the School Breakfast Pilot Program. The questions about race and cultural origin, income, and household composition are needed for the subgroup analysis to (1) identify characteristics that may be related to outcomes or (2) to inform efforts to improve the program for particular subgroups. The demographic data are also collected to ensure the sample is representative. The questions about participation in public assistance programs are needed to address research questions related to food security status and participation in other food assistance programs.

The Food and Physical Activity Experiences Survey (Appendices F21/F22) includes potentially sensitive questions about youth food security status, race and cultural origin, and gender identity. Questions on the first two topics were used in the SNMCS-II Student Interview with no evidence of harm, and all of the questions were developed by Federal agencies or used in other Federal surveys.<sup>21,22,23</sup> These questions are needed to address study research questions and to perform subgroup analyses.

During the consent process, respondents will be informed of the study purpose, activities, privacy guidelines, risks and benefits, and what their consent means. Teens will be read an assent

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<sup>21</sup> Self-Administered Food Security Survey Module for Children Ages 12 Years and Older (September 2006) by Connell et al. <https://www.ers.usda.gov/media/8283/youth2006.pdf>. Accessed October 19, 2020.

<sup>22</sup> See <https://nces.ed.gov/FCSM/pdf/buda5.pdf>, page 13. Accessed October 19, 2020.

<sup>23</sup> <https://www.govinfo.gov/content/pkg/FR-1997-10-30/pdf/97-28653.pdf>. Accessed October 19, 2020.

statement, and all respondents will be informed that they can decline to answer any question they do not wish to answer, and they can change their mind about participating. Participants will also be assured that there will be no negative consequences if they do not participate in the data collection activity, and it will not affect receipt of child care or any other services their family may receive or apply for in the future. Respondents will also be assured of privacy during consent and at the outset of the interview. Instruments that collect personally identifiable information (PII) include a statement notifying respondents that the study collects PII under the Privacy Act of 1974, and that responses will be kept private to the extent provided by law and FNS regulations. All survey responses will be held in a secure manner.

**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.**

The public affected by this study are State agencies; private sector for-profit and not-for-profit businesses; and individuals, including infants and children up to age 18 and their parents or guardians. With this submission, there are 19,373 respondents, 44,176 responses, and 26,538 burden hours.<sup>24</sup> The average number of responses per respondent is 2.18. Appendix N shows sample sizes, frequency of response, 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 similar types of respondents.

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

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<sup>24</sup> Totals include responses and burden associated with respondents and non-respondents.

Annualized cost to respondents for their burden is the product of each type of respondent's annual burden and average hourly wage rate, based on the Bureau of Labor Statistics, May 2020 National Occupational and Wage Statistics.<sup>25</sup> All data will be collected within one year. To account for a fully loaded wage rate, an additional 33 percent was added to the hourly wage. The estimates of annualized costs to State and local governments are based on the burden estimates and utilize the U.S. Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Estimates:

[https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000). The estimated annualized total cost to respondents associated with this collection is \$821,275.86 including fringe.

**Table A.12.1 Estimated total cost to respondents by respondent type, including total fringe**

Respondent type	Occupation code	Estimated hourly wage <sup>1</sup>	Estimated cost (without fringe)	Estimated cost (with 33% fringe)	Difference (total fringe)
Directors	21-2021, Directors, Religious Activities and Education	\$25.32	\$174,446.35	\$232,013.64	\$57,567.29
Food preparers	35-9099, Food Preparation and Serving Related Occupations	\$13.41	\$63,689.39	\$84,706.90	\$21,017.50
Provider Staff	39-9011, Childcare Workers	\$12.88	\$2,524.67	\$3,357.82	\$833.14
Sponsors	11-9031, Education and Childcare Administrators, Preschool and Daycare	\$26.41	\$121,960.69	\$162,207.72	\$40,247.03
Parents	00-0000, All occupations	\$27.07	\$253,160.57	\$336,703.55	\$83,542.99
State agency managers	11-3010, Administrative Services and Facilities Managers	\$51.98	\$1,718.98	\$2,286.24	\$567.26
<b>Total</b>			<b>\$617,500.65</b>	<b>\$821,275.86</b>	<b>\$203,775.21</b>

Note: Infants, children, and teens were assumed to have no hourly wage rate. See Appendix N for calculations.

<sup>1</sup> Estimated hourly wages are based on the burden estimates and utilize the U.S. Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Estimates: [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

### 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**

<sup>25</sup> [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)

**operation and maintenance and purchase of services component.**

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

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

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

The annualized government costs include the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The annualized cost to the Federal government for all tasks is \$2,721,305.15. This information collection assumes a total of 2,080 hours of Federal employee time for a GS-13, Step 1 Social Science Research Analyst serving as the FNS project officer at \$49.68 per hour, plus 33 percent of that amount over and above the salary, for fringe benefits.<sup>26</sup>

**A15. Explanation of program changes or adjustments.**

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

This submission is a new information collection request as a result of program changes, and will add 26,538 burden hours and 44,176 responses to OMB's inventory.

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

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

**A.16.A. Plans for tabulation and publication**

Findings from the analyses described here will be shared with FNS in five sets of data tables organized by the study objectives: (1) Objective 1; (2) Objective 2; (3) Objectives 3a, 3b, 4, and 5; (4) Objective 3c; and (5) Objective 6.

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<sup>26</sup> The Federal employee pay rate is based on the 2021 General Schedule of the Office of Personnel Management for the locality of Washington, DC ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf)). Accessed April 21, 2021.

Across all objectives, most analyses will be descriptive; however, research questions for several objectives require multivariate modeling to examine the relationship between provider characteristics and key outcomes including, for example, the nutritional quality of CACFP meals and snacks and the levels of plate waste. Analyzing research questions for some objectives will also require multivariate modeling to examine relationships between key outcomes, including, for example, the relationship between the cost and nutritional quality of CACFP meals and snacks.

Each set of tables will also include a detailed description of the methods used to collect and analyze the data and crosswalks that map tables to corresponding research questions and survey questions or instruments. The study team will brief FNS on major findings within two weeks of submitting each set of draft tables. Revised tables, methods summaries, and crosswalks will incorporate FNS's comments on the draft deliverables and briefings.

The study team will also develop at least four manuscripts for publication in peer-reviewed journals. Each manuscript will focus on one of the five topic areas described above. The study team will work collaboratively with FNS to identify the specific topic areas (and outcomes within those topic areas) to focus on and the journals that the results might be discussed in. The study team will also provide draft manuscripts for FNS review and contributions ahead of submission. FNS staff meeting criteria for authorship will be named as co-authors on final submissions.

After the journal articles are underway, the study team will prepare a plain language summary report that presents key findings across all of the study's topic areas. The report will include appendices with all the detailed tables and summaries of methods described above.

#### **A.16.B. Project time schedule**

Recruiting for SNACS-II must begin by the start of PY 2022–2023 so that data collection

can be completed before the end of the PY.

Activity	Schedule
State and provider sampling	January to May 2022 (or 4 weeks post-OMB approval)
Recruiting and child sampling	August 2022 to January 2023 (or 9 months post-OMB approval)
Data collection	January to May 2023 (or 13 months post-OMB approval)
Analysis and reporting	August 2023 to March 2025 (or 20 months post-OMB approval)
Data files and documentation	October 2023 to March 2025 (or 22 months post-OMB approval)

**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 is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.