

Memorandum

Date: April 10, 2020

To: James Crowe, OMB Desk Officer

Through: Kelly Stewart, Food and Nutrition Service, Chief, Planning & Regulatory Affairs;
Ruth Brown, United States Department of Agriculture, Office of the Chief Information Officer

From: Gwendolyn Holcomb, Office of Community Food Systems, Child Nutrition Programs, USDA, Food and Nutrition Service

Re: Under Approved Generic Office of Management and Budget (OMB) Clearance No. 0584-0524 - Request for Approval to conduct Evaluation of Farm to School Program Training and Curricula for State Agencies and Producers

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval for formative research under Approved Generic OMB Clearance No. 0584-0524.

This request seeks OMB approval to collect voluntary feedback through a post-training survey from State agencies (SAs), tribal-level farm to school trainers, and state agency representatives (individuals who work with government or non-governmental organizations that provide training and information for agricultural producers (farmers, fishers, ranchers). In addition to the post-training survey for SAs and their representatives, formative research will also be conducted with producers who take part in subsequent trainings held by the state-level farm to school trainers.

The Farm to School Program Training and Curricula is a producer-focused training designed to increase producers' knowledge and understanding of farm to school programs, increase participation in farm to school activities, and increase the amount of local foods that producers sell to Child Nutrition Programs (CNP). The curricula, designed to be a train-the-trainer model, is a two-day training course covering various topics, delivered through a combination of in-person lecture, on-line, webinars and field-trips. SAs and their representatives are trained on the curriculum, then expected to use the information obtained to conduct further training with producers within their regions.

The research will include a survey to collect feedback from State agencies (SAs) and their representatives to assess objectives, the learning outcomes and challenges after completing a farm to school training. The feedback will also help gauge the trainees' perceived readiness to provide training to producers, study the effectiveness of the training to inform the development of the curriculum, and examine areas that might be improved in follow-up technical assistance.

Formative research will also be carried out with producers who take part in subsequent trainings held by the state level farm to school trainers. Pre- and post-training surveys will evaluate the following: (1) current sales of local food to schools; (2) knowledge change regarding specific farm to school strategies and topics; (3) perceptions about usefulness of training topics; (4) suggestions for improving trainings; and (5) plans for implementing strategies. A final survey will be conducted 6-months to one year after the producer trainings focused on what farmers/producers sold to schools (to examine the change from baseline) and any information and training needs that remain. The following information is provided for your review:

1. **Title of the Project:** Evaluation of Farm to School Program Training and Curricula for State Agencies and Producers
2. **Control Number:** 0584-0524, Expires 12/31/2022
3. **Public Affected by this Project:**
Businesses/NGOs
State and Local/Tribal Employees

4. **Number of Respondents:**

Businesses/NGOs

- Approximately 1,000 agricultural producers (farmers, ranchers, fishers) who take part in a training on farm to school.
- Approximately 100 state agency representatives who are individuals working for non-governmental organizations and other businesses who take part in a train-the-trainer workshop in order to assist producers in selling to farm to school markets.

State and Local/Tribal Employees

- Approximately 250 state level or local/tribal employees who will take part in a train-the-trainer workshop in order to assist producers in selling to the school markets.

5. Time Needed Per Response:

Table 5.1 - Time Needed for Collection Activities by Audience*

Audience	Collection Activity	Time (minutes)	Time (hours)
Producers (Businesses/NGOs)	Sign-in Form	5	0.08
	Training Recruitment Script	2	0.03
	Consent Form	10	0.17
	Training Pre-Survey	15	0.25
	Training Post-Survey	10	0.17
	Training 6-month to 1-Year Follow-Up Survey Recruitment Email	2	0.03
	6-month to 1-Year Follow-Up Program Impact Evaluation Survey	10	0.17
	Total	54	0.90
State Agency Staff/Trainers (State and Local/Tribal Employees)	Survey Recruitment Email	2	0.03
	Consent Form	10	0.17
	Training Post-Survey	20	0.33
	Total	32	0.53
State Agency Representatives/Trainers (Businesses/NGOs)	Survey Recruitment Email	2	0.03
	Consent Form	10	0.17
	Training Post-Survey	20	0.33
	Total	32	0.53
*The time is an average response per respondent.			

6. Total Burden Hours on Public:

867.5 burden hours from 1,350 individuals.

(a) Affected Public		(b) Appendix	(c) Response Type	(d) Number of Respondents	(e) Frequency of Response	(f) Est. Total Annual Responses (d x e)	(g) Hours per Response	(h) Total Burden Hours (f x g)
State, Local/Tribal Employees	State Agency Staff/Trainers	A	Consent Forms	250	1	250	0.17	42.5
		B	Recruitment Letter	250	1	250	0.03	7.5
		C	Training Post-Survey	225	1	225	0.33	74.25
Subtotal				250	2.9	725	0.17	124.25
Businesses / NGOs	State Agency Representatives/Trainers	A	Consent Forms	100	1	100	0.17	17
		B	Recruitment Letter	100	1	100	0.03	3
		C	Training Post-Survey	75	1	75	0.33	24.75
		D	Sign-in Form	1,000	1	1,000	0.08	80
		E	Recruitment Script	1,000	1	1,000	0.03	30
		F	Consent Forms	900	1	900	0.17	153
		G	Pre-Survey	900	1	900	0.25	225
		H	Post-Survey	650	1	650	0.17	110.5
		I	Recruitment Letter Final Survey	500	1	500	0.03	15
		J	Final Survey	500	1	500	0.17	85
Subtotal				1,100	5.20	5,725	0.13	743.25
Total				1,350	4.77	6,450	0.13	867.50

Note: non-respondents are counted in the overall burden estimates.

7. Project Purpose, Methodology, and Formative Research Design:

Background

The Food and Nutrition Service (FNS) administers 15 Federal nutrition assistance programs of the United States Department of Agriculture (USDA). The mission of FNS is to reduce hunger and food insecurity in partnership with cooperating organizations by providing children and needy people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence. Among the programs that FNS administers are the Child Nutrition Programs (CNP), including the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, Summer Food Service Program, and Fresh Fruit and Vegetable Program. Administered by State Agencies (SAs), these programs help fight hunger by reimbursing organizations for providing healthy meals to children that meet Federal meal pattern requirements.

The Office of Community Food Systems (OCFS) oversees the Farm to School Program within FNS. The OCFS three pillars of work include the Farm to School grant program, training and technical assistance, and research and evaluation. Each year, USDA awards approximately \$5 million in grants to help eligible entities implement farm to school programs that improve access to local foods in schools. OCFS clarifies policies and regulations, develops resources, and conducts training to assist our stakeholders with starting or elevating their farm to school activities. USDA also conducts the Farm to School Census, which captures information about the level and impact of farm to school initiatives across the nation (<https://www.fns.usda.gov/farmentoschool/farm-school>).

Section 18 of the Richard B. Russell National School Lunch Act (NSLA) establishes a Farm to School Program in order to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve access to local foods in eligible schools.

Under this initiative, FNS, in cooperative agreement with the National Center for Appropriate Technology and other entities, is developing a training curriculum, conducting trainings of 250 trainers through regional workshops, and evaluating the results of farm to school trainings for producers to build their capacity to launch or expand farm to school efforts. This project will prepare State agencies and other entities with the knowledge and skills necessary to implement the developed trainings in their states among agricultural producers (farmers, fishers, or ranchers) on key farm to school topics.

Purpose

The purpose of the proposed research is to obtain feedback from two target audiences. In the first (state, local, and tribal agency trainers, as well as their representatives), the research will assess the objectives, learning outcomes and challenges. The State, Local, and Tribal agency trainers and their representatives generally work with government or non-governmental organizations that provide training and information for agricultural producers (farmers, fishers, ranchers). The research will also assess the trainees' perceived readiness to provide training to

producers, study the effectiveness of the training to inform the development of the curriculum, and examine areas that might be improved in follow-up technical assistance.

For the second target audience (producers), the proposed research will be carried out to evaluate the following: (1) current sales of local food to schools; (2) knowledge change regarding specific farm to school strategies and topics; (3) perceptions about usefulness of training topics; (4) suggestions for improving trainings; and (5) plans for implementing strategies. These producers are generally farmers, ranchers, fishers who take part in a training on farm to school topics.

Methodology/Research Design

This research will utilize paper and online surveys, including both closed and open-ended questions, to collect information from farm to school trainers and producers. Methodology will include a post-survey conducted with SAs and their representatives trainers (Attachment C). Producers who participate in the trainings will take part in a survey prior to and after the training (Attachments G and H). A final follow-up survey will also be administered to producers 6-months to one-year after the training to examine change in sales to schools (Attachment J).

Completion of all surveys will be 100% voluntary/optional and confidential unless participants choose to share their information.

Trainer Surveys: Farm to school trainers will be taking part in workshops focused on providing information and expertise on selling local food to schools. Trainers will take in a post-survey following the train-the-trainer session.

(a) Recruitment, consent, and delivery method

Following the train-the-trainer sessions, each trainer participant will be contacted by email (Attachments B) to take part in the post-survey. If they agree, trainers will be directed to a weblink to take part in the survey. This weblink will open up to the consent form (Attachment A) and, if they agree to take part in the research, will then direct them to the survey online (Attachment C).

(b) Compensation

No compensation will be provided for taking part in the trainer post-survey.

(c) Data Analysis

Data analysis will be descriptive in nature. To assess readiness to provide trainings to producers, the data analysis will examine a number of questions regarding perceptions of readiness. Since many of the questions are expected to be similar items, appropriate non-parametric tests will be employed. Open-ended questions will be coded to examine changes needed in the curriculum and identify further technical assistance needed by the trainers.

Producer Surveys: Producers will take part in various trainings provided by the state-level farm to school trainers listed above; these trainings will focus on, among other things, selling local food products to schools.

(a) Recruitment, consent, and delivery method

Trainers who implement the trainings of producers will be provided with instructions on how producer participants will be reached for the evaluation. Producers will take part in three separate surveys for the evaluation. The first survey will be in paper format and will be completed at the start of the training (Attachment G). Follow-up surveys will be completed via paper at the end of the workshop (Attachment H).

When the producers first arrive at training, they will be asked to fill out a sign-in form (Attachment D) that includes their name, the name of the farm, and contact information, including email and phone number. The pre-surveys, in paper format (Attachment G) will be available at the beginning of the training at the training site. At this time, producers will be given the context for the research (Attachment E), asked to read and sign the consent form (Attachment F), and voluntarily participate in the research. On the pre-survey (Attachment G), producers will be asked to enter their full name, the name of their farm, and the state they reside in, so that pre and post-surveys can be matched for analysis. Contact information will be kept private by FNS contractors and not shared with anyone outside the research team, except as otherwise required by law. Post-surveys (Attachment H) will be completed at the end of the workshop via paper format. Final surveys (Attachment J) will be completed six months to one year after the trainings and will be completed via email.

(b) Compensation

No compensation will be provided to producers for the pre- and post-surveys of the training. Some participants may receive a \$25 Visa or Mastercard incentive by participating in a drawing. Individuals wishing to be part of the drawing, will be entered into a random drawing to receive one of 20 Visa or Mastercard gift cards worth \$25 each. This process will be utilized to increase producer response rates for the final survey being distributed six months to one-year following the state-level farm to school producer training.

(c) Data Analysis

Data analysis will be descriptive in nature. The analysis of change in knowledge and attitudes will use paired t-tests for continuous indicators and appropriate non-parametric tests for categorical data from the pre- to post-survey. Results will be based on data aggregated across all trainings and also separately by training site. Open-ended questions will be coded to examine changes needed in the curriculum and further technical assistance needed by the producers.

Outcomes/Findings

Research summary findings may be published either electronically or in print, but such documents will not include information that personally identifies any of the research

participants. If published, research findings will be provided online through the project partners' websites, National Center for Appropriate Technology and National Farm to School Network. In addition, findings may be published in a peer reviewed journal. Finally, results will be provided to each training site for their specific site.

8. Confidentiality:

Using the *Agreement on Security of Comments Form* participants will be informed of privacy act provisions before responding to the pre-survey. System of Record FNS-8, FNS Studies and Reports, published in the Federal Register on 4/25/1991 at 56 FR 19078, covers personal information collected under this study and identifies safeguards for the information collected.

Storage: Paper copies of any surveys and consent forms will be kept in a locked file folder and office with NYU researchers. Dataset/online forms will be kept in password protected files that only the researchers have access to.

Authorized Users: NYU researchers (contractor) will compile and develop the datasets and surveys for analysis and will comply with all provisions of the Privacy Act. They will not release or share datasets with other project partners without consulting FNS.

Safeguards: Datasets will be downloaded from online survey tools; computers used to process the data will be located in secure areas and only accessible to research staff. Back-up records, if used, will be stored under the same secure conditions. Datasets for analysis (e.g., pre- and post-surveys) will be developed by linking data through personally identifiable information (e.g., state of farm, name). Once the datasets have been created, the resulting dataset will be de-identified. In the resulting analysis dataset, survey responses will be identified by a code only (no personal identifiers). Names and other identifying information linked to the code will be maintained in a separate file until no longer needed but not longer than two years. The identifiable portion of the records will then be destroyed.

Federal Costs: \$158,974

The total cost to the Federal government is \$158,974, which includes the total cost for contractor (NewYork University) and Federal staff costs for developing the study instruments, collecting and analyzing data, and fully loaded wage rates. The contractor cost is estimated at \$156,578. This is based on an estimate of hours, with fully loaded wage rates of \$25.00 to \$74.40 per hour, and includes overhead costs.

The Federal staff cost is estimated at \$2,396, assuming a total of 40 hours of Federal employee time. Federal employee time includes 40 hours for a GS-14, Step 3 Program Analyst at \$59.90 per hour (\$2,396 total). To account for a fully loaded wage rate, an additional 33 percent, or \$797.87 ($\$2,396 \times 0.333$), was added to the total Federal hourly wages. Federal employee hourly rates are based on the General Schedule and locality payment for the Washington D.C. Metropolitan Area provided by Office of Personnel Management (OPM) for 2019. (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB_h.pdf)."

9. Research Tools/Instruments:

- **Attachment A:** Consent Form for Trainers
- **Attachment B:** Post Survey Recruitment (Email) for Trainers
- **Attachment C:** Post Survey for Trainers (Online)
 - **Attachment C1:** Screenshot – Post Survey for Trainers
- **Attachment D:** Producer Sign-in Form for Training
- **Attachment E:** Recruitment Script for Producer Training
- **Attachment F:** Consent Form for Producers
- **Attachment G:** Producer Training Pre-Survey (Paper)
- **Attachment H:** Post Survey for Producer (Paper)
- **Attachment I:** Recruitment Letter (Email) for Producers Final Follow-up Survey
- **Attachment J:** Final Follow-up Survey for Producers (6-months to 1-year following training) (Online)
 - **Attachment J1:** Screenshot – Final follow Up Survey