

**SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-0642 Revision:**

Team Nutrition Database

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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 collection of this information aims to help the mission of USDA's Team Nutrition initiative, which is to support national efforts to promote lifelong healthy food choices and physical activity by improving the nutrition practices of the Child Nutrition Programs. The collected information helps to build and maintain a stronger network among organizations participating in the Child and Adult Care Food Program (CACFP) and schools participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) committed to providing healthy meals and environments for their program participants. It helps to keep these entities up-to-date with the available resources developed under the Team Nutrition initiative to support the nutrition standards of their respective Child Nutrition Programs. The Team Nutrition initiative of the United States Department of Agriculture's Food and Nutrition Service falls under SEC. 19. [42 U.S.C. 1788] TEAM NUTRITION NETWORK, Child Nutrition Act of 1966 (Appendix 1). This collection will help achieve the purposes of Team Nutrition Network included in sec. 19 [42 U.S.C. 1788] (a)(1)-(5) and as cited below.

The purposes of the team nutrition network are—

(1) to establish State systems to promote the nutritional health of school children of the United States through nutrition education and the use of team nutrition messages and material developed by the Secretary, and to encourage regular physical activity and other activities that support healthy lifestyles for children, including those based on the most recent Dietary Guidelines for Americans published under section 301 of the National Nutrition Monitoring and Related Research Act of 1990 (7 U.S.C. 5341);

(2) to provide assistance to States for the development of comprehensive and integrated nutrition education and active living programs in schools and facilities that participate in child nutrition programs;

(3) to provide training and technical assistance and disseminate team nutrition messages to States, school and community nutrition programs, and child nutrition food service professionals;

(4) to coordinate and collaborate with other nutrition education and active living programs that share similar goals and purposes; and

(5) to identify and share innovative programs with demonstrated effectiveness in helping children to maintain a healthy weight by enhancing student understanding of healthful eating patterns and the importance of regular physical activity.

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 information collection of the Team Nutrition School and Team Nutrition CACFP Organization is currently approved under OMB Control #0584-0642, which expires on October 31, 2021. This information is collected through the online forms FNS 891 (Appendix 2) for [Team Nutrition Schools](#), and FNS 892 (Appendix 3) for [Team Nutrition CACFP Organizations](#). No hard copy is available. USDA's Team Nutrition staff review this information as a process to validate and approve this information. The approved collected information is posted at the Team Nutrition Database website for Schools and CACFP Organizations, creating a network system listing eligible entities committed to providing healthy meals and environments for their program participants. Team Nutrition also uses the email addresses to send electronic correspondence, such as bimonthly newsletters and promotions that announce the availability of Team Nutrition materials that support nutrition efforts. The frequency of the collection is annually since respondents are expected to submit one update per year. The response to this collection is voluntary. Respondents can submit their new enrollment or updates any time of the year. Team Nutrition sends an annual Reminder Notification (Appendix 4) to all respondents to submit changes as needed. The collected information is publicly available and upon request, Team Nutrition shares this information with stakeholders.

Since the approval of this collection in 2018, FNS has removed the school county field from the Team Nutrition Schools form because many participants did not complete this field. FNS has made no changes to the collection instrument for Team Nutrition CACFP Organizations or to the reminder notifications. Additionally, the title of this collection has been renamed from “Contact Information of Schools that Participate in the National School Lunch Program and Organizations that Participate in the USDA’s Child and Adult Care Food Program” to “Team Nutrition Database” as it is commonly known. The school form revision is to decrease burden on users of the Team Nutrition Database and continue the collection, currently approved through October 31, 2021.

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.

FNS is committed to complying with the E-Government Act of 2002 to promote the use of technology. This data collection is conducted through a web-based application using Drupal 9 with a mobile-friendly design which allows users to easily access the online enrollment forms anytime from smart devices and traditional computers. Once reviewed and approved by the Office of Management and Budget, the forms will be updated with the new expiration date. FNS estimates that all 366,390 responses (100%) 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.

FNS does not have another collection where eligible schools that participate in the USDA's National School Lunch Program, or institutions that participate in the USDA's Child and Adult Care Food Program can enroll and be recognized. This data collection will support the mission of Team Nutrition with Child Nutrition Programs.

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.

This data collection has a low impact on small business as it collects basic contact information in an easy and accessible way. The forms are available online with a mobile friendly design so that the public can access it through mobile devices. Most of the fields/questions on the collection forms have easy to respond questions to minimize the burden of the public when completing or updating the enrollment form. FNS estimates that out of the 122,130 respondents for this collection, 19,662 respondents (16 %) 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.

The information is collected for the purpose of providing Child Nutrition Program's operators with Team Nutrition resources that support national efforts to promote lifelong healthy food choices and physical activity by improving the nutrition practices of the Child Nutrition Programs as soon as they become available. Collecting data less frequently would delay the use and implementation of these resources that aim to meet the Child Nutrition Program nutrition standards. USDA, Food and Nutrition Service (FNS) will send out periodic reminders to Child

Nutrition Program's operators to make sure the information is current. An example of a reminder notification to schools is included in Appendix 4.

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.

The 60 Day-Notice for this Information Collection Request was published in the Federal Register on Thursday, March 4, 2021 (Vol. 86, No. 41, Pages 12593 - 12593). The public comment period ended on Monday, May 3, 2021. The Child Nutrition Community was informed through a PartnerWeb notification about the period to submit comments to this notice.

FNS received one comment in response to this notice. This comment was submitted by the School Nutrition Association (Appendix 5) and a response was sent by FNS (Appendix 6). This entity expressed the need for the collection to be easy to access and use. This information collection is easy to access and complete. The information collections forms are available online with a mobile-friendly design so that the public can access it through multiple devices. The fields are easy to respond questions to minimize the burden of the public when completing or updating the enrollment form. The collected information is publicly available for everyone to access. This helps recognize eligible schools and institutions that voluntary signed up to be part of this network committed to providing healthy meals and environments for program participants. The members of this network can request free nutrition resources to support their nutrition efforts. FNS will also continue to communicate with school nutrition professionals and other Child Nutrition operators about Team Nutrition resources, including grant funding opportunities, in a number of ways, such as the Team Nutrition E-Newsletter, Team Nutrition Schools Database, Twitter (@TeamNutrition), and through State agencies.

The following individuals/organizations have been consulted about burden estimates and/or other characteristics associated with this data collection:

1. **Name:** Nadia Davis
Organization: School Nutrition Association
Email Address: ndavis@schoolnutrition.org
Response: Submitted a response to the 60-day Federal Notice, published in March 4, 2021, see Appendix 5.
2. **Name:** Tim Turner
Organization: Partnership Academy
Email address: turner@paschool.org
Response: No response.
3. **Name:** Shawna Longie
Organization: Manhattan Public School
Email address: slongie@mhstigers.org
Response: No response.
4. **Name:** Sonja Garlin
Organization: Trinity Child Care Center
Email address: sonja@common-courtesies.com
Response: It takes around 5 minutes to fill the enrollment form and update the information. The instructions are easy to follow.
5. **Name:** Mais Alhamdani
Organization: Stanislaus County Office of Education
Email address: malhamdani@stancoe.org
Response: No response.

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.

The respondents will not receive gifts or remuneration, instead they will receive monthly electronic correspondence regarding Team Nutrition materials that support nutrition education and provide technical assistance to foster an environment of health.

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. The Privacy Officer, Miguel Marling, from the Information Management Branch reviewed this collection. Mr. Marling replied that “I have reviewed the forms– as they do not represent records in a System of Records maintained by and routinely retrieved by personally identifiable information (PII)(names, SSNs, other identifiers), they do not require a Privacy Act Statement per the requirements outlined at 5 U.S.C. § 552a(e)(3)...” The collected information includes contact information of entities/businesses that operate a USDA’s Child Nutrition Program and nutrition and wellness best practices followed by this entity, not personal information. Respondents will be informed that the information collected will be publicly available to foster peer connections and collaboration. This information collection does not request any personally identifiable information, nor does it include a form that requires a Privacy Act Statement.

The collected work emails are needed for communication with interested point of contacts at schools or child care sites concerning childhood nutrition and wellness at their sites. This information will be protected as it will be hidden in the database/application and only available when the respondents click to update the school or CACFP organization information.

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.

This information collection will be a voluntary response and will have questions to collect information about the type of program managed by the entity, including contact information of key staff and nutrition and wellness best practices followed by the entity. The Privacy Officer, Miguel Marling, from the Information Management Branch reviewed this collection. Mr. Marling replied that “I have reviewed the forms– as they do not represent records in a System of Records maintained by and routinely retrieved by personally identifiable information (PII) (names, SSNs, other identifiers), they do not require a Privacy Act Statement per the requirements outlined at 5 U.S.C. § 552a(e)(3)...” Some respondents may include their personal email address, which is personal identifiable information, but the requested information is work email address. Emails will be protected as this information will be hidden in the online database/application and only available when the respondents click to update the record for the school or CACFP organization. This information allows FNS to make targeted promotions to the program operators and foster a peer-to-peer network as the information is publicly available.

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.

With this revision to the approved information collection submission, there are 122,130 respondents (534 respondents less than approved collection), 366,390 responses (1,602 responses

less than approved collection), and 35,484 burden hours (430 hours less than approved). The total estimated number of respondents is approximately 122,130 (22,130 are CACFP organizations and 100,000 are schools). For CACFP organizations, the total is broken down as follows: 19,662 CACFP sponsors; centers only; 674 CACFP sponsors of all home care; and 1,794 CACFP sponsors of adult care. The CACFP's organization and the schools will be asked to voluntarily complete one (1) enrollment form and submit changes as needed. The estimated total annual burden on respondents is 35,484 hours. This total is based on the estimated time of response which varies from 0.0835 to 0.167 hour (5-10 minutes), with an average estimated time of 0.097 (approximately 5.82 minutes) for all participants.

Estimated Total Annual Burden on Respondents: 35,484 hours. See the table below for estimated total annual burden for each type of respondent.

Affected Public	Respondent	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dxe)
	Reporting Burden					
Businesses or Other for Profit, Not-for-Profit	CACFP Organizations (completed form) – CACFP Sponsors: Centers Only	19,662	1	19,662	0.25	4,915.5
	CACFP Organizations (completed form) – CACFP Sponsors of All Home Care	674	1	674	0.25	168.5
	CACFP Organizations (completed form) – CACFP Sponsors of Adult Care	1,794	1	1,794	0.25	448.5
	CACFP Organizations (updated form) – All	22,130	1	22,130	0.0835	1,847.9
	CACFP Organizations (reminder notification)	22,130	1	22,130	0.025	553.3
Subtotal of Businesses or Other for Profit, Not-for-Profit		22,130		66,390		7,933.6
	Schools (completed form)	100,000	1	100,000	0.167	16,700

	Schools (updated form)	100,000	1	100,000	0.0835	8,350
	Schools (reminder notification)	100,000	1	100,000	0.025	2,500
	Subtotal for State, Local, or Tribal Government	100,000		300,000		27,550
	Total Reporting Burden	122,130		366,390		35,484

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

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational and Wage Statistics, Occupational Group (35-0000) (http://www.bls.gov/oes/current/oes_nat.htm). The mean hourly wage (for 35-1012: First-Line Supervisors of Food Preparation and Serving Workers for functions performed by local program operators) is \$18.21 per staff hour. With a burden of 35,484 hours at \$18.21 per hour, the base annual respondent cost is estimated at \$646,156.45. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$213,231.63. Thus, the total annual respondent cost is \$859,388.08.

Total estimated respondent annual cost = 35,484 hours x \$18.21 = \$646,156.45

Fully Loaded Wages = \$646,156.45 x 0.33 = \$213,231.63

Total annual respondent cost = \$646,156.45 + \$213,231.63 = \$859,388.08

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.

No capital/start-up or ongoing operation/maintenance costs are estimated in this information collection request.

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 estimated total cost to the Federal government is \$2,581,073.70, with an average annual cost of \$860,357.90. The table below includes a cost breakdown per year of the estimated expenses for this collection of information. This estimate is based on an average of the cost history for hosting costs and contractual price for operational and maintenance services among the three years of the collection. The annual costs include \$60,000 for Hosting and Operation & Management costs, conducted by the Office of Information and Technology within USDA’s Food and Nutrition Service. In addition, the estimated annual salary cost for the review of applications by federal employee is \$314,800.13 using the [OPM Salary Table 2021-DCB](#) (for the Washington, DC, MD, VA, WV, and PA area). This annual cost is calculated using an [average basic hourly pay rate](#) of \$51.34/hr (Program Analyst GS- 13, step 2) multiplied by 6,119 hours (366,390 responses x 0.0167 hours) to review all applications received plus the oversight ten hours per year multiply by the basic hourly pay of a Branch Chief GS-14 step 5 (\$66.54/hour). An additional 33% of the estimated base annual cost to the Federal government was added to represent fully loaded wages, equaling \$103,884.04. Thus, the total annual salaries cost is \$418,684.17.

	Operational and Maintenance with Small Enhancements	Hosting & Maintenance Fees	Salaries	Total

1 st year	\$374,566.00	\$60,000.00	\$418,684.17	\$853,250.17
2 nd year	\$380,662.20	\$60,000.00	\$418,684.17	\$859,346.37
3 rd year	\$389,793.00	\$60,000.00	\$418,684.17	\$868,073.70
TOTAL	\$1,145,021.20	\$180,000.00	\$1,256,052.50	\$2,581,073.70

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 is a revision of a currently approved information collection, which expires in October 31, 2021. The current inventory for this information collection is 122,664 respondents, 35,914 total annual burden hours and 367,992 total annual responses. There are 122,130 total annual respondents for this information collection this adjustment reflects a decrease of -534 respondents. FNS is requesting 35,484 total annual burden hours and 366,390 total annual responses, a decrease of -1,602 responses and decrease of -430 total annual burden hours due to adjustments to the total number of respondents and program participation. The number of CACFP Organizations reduced from 22,664 to 22,130 CACFP Organizations based on the USDA FNS National Data Bank from FY 2018 and FY 2016.

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.

All information collected is be available to the general public once reviewed and revised by USDA, Food and Nutrition Service to validate the information is true and free of errors. This information includes the name of the entity, address, phone number, the name of the Child

Nutrition Program that the entity participates in, enrollment, and key point of contacts per entity. This information will be available at the Team Nutrition Application page, which is under development and will be linked to Team Nutrition website. On a monthly basis, Team Nutrition will check how many schools and CACFP organizations are enrolled and on a weekly basis requests to enroll or update will be reviewed by Team Nutrition staff. Otherwise, this collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

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.

USDA, Food and Nutrition Service will include the new Expiration Date for OMB Approval as part of the information collection forms.

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.