

**Supporting Statement for OMB Clearance for the School Meals Operations  
Study: Evaluation of the COVID-19 Child Nutrition Waivers and Child Nutrition  
Programs**

**Part A**

**Revision to OMB # 0584-0607, School Meals Operations Study (SMO)**

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## **Introduction**

This information collection request is for a revision of the approved collection for the School Meals Operations (SMO) Study (OMB Control No. 0584-0607, expiration date: 08/31/2022), which collects data annually through various combinations of online surveys of school food authority (SFA) directors and State Child Nutrition (CN) directors, and a disaggregated administrative data collection from States. The SMO Study anticipates annual data collections through school year (SY) 2023-2024. This study is modular in nature, whereby some topics are included each year while others are added or removed as Food and Nutrition Service (FNS) priorities change. Because the research questions and associated survey topics change each year as FNS policy and program needs change, FNS usually seeks OMB approval for each annual data collection separately. The previous OMB approval covered data collection in SY 2020-2021 and, due to the COVID-19 pandemic and its resulting impacts on school districts nationwide, the collection only included the state-level survey and administrative data collection (the SFA director survey was cancelled for SY 2020-2021). The SY 2020-2021 collection was also repurposed to meet States' statutory reporting requirements for the COVID-19 CN nationwide waivers pursuant to Section 2202 of the Families First Coronavirus Response Act (FFCRA) (Appendix A). This information collection request is to update data collection topics and instruments for the SY 2021-2022 and SY 2022-2023 data collections, which together will include two state-level administrative data collections (covering fiscal years 2021 and 2022), two online surveys of State CN directors (Fall 2021 and Summer 2022), and one online survey of SFA directors (Winter 2021/2022), and will again be used to meet States' statutory reporting requirements on the COVID-19 CN nationwide waivers under FFCRA.

## **A1. Circumstances Making the Collection of Information Necessary**

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

The U.S. Department of Agriculture's (USDA) FNS is responsible for the administration of the CN programs—including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), NSLP Seamless Summer Option (SSO), the Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), and others—at the federal level. To inform current and future policy decisions and effectively oversee these programs, FNS requires information on how these programs are operating. Although FNS oversees these programs, SAs administer them through agreements with SFAs and other local entities that implement the programs at the local level.

This information collection request is for a revision to the currently approved School Meals Operations Study: State Agency COVID-19 Child Nutrition Waivers Evaluation (SMO, OMB Control Number 0584-0607, expiration date 08/31/2022). This collection is necessary to provide up-to-date information about CN program operations, including the use and impact of the COVID-19 CN nationwide waivers as required by the FFCRA. The annual data collected from this study allows FNS to describe and assess program operations, provide input for legislation and regulations on the CN programs, and develop pertinent technical assistance (TA) and training for program staff at the State and local levels. This information is necessary for FNS to understand how recent and proposed legislation, regulations, policies, and initiatives change CN program operations.

Because the COVID-19 pandemic has changed the way that school meal programs operate, with other CN programs such as the CACFP and SFSP being used in place of or in combination

with the NSLP and SBP to provide meals to students, the SMO Study will collect administrative and web survey data from States on each of these programs, and web survey data from SFAs on the programs they operate. The state-level collection will focus primarily on meeting States' statutory reporting requirements for the nationwide CN COVID-19 waivers approved by FNS pursuant to section 2202 of the FFCRA (Pub. L. 116-127; Appendix A) and used in fiscal year (FY) 21 and FY 22, which correspond roughly to SY 2020-2021 and SY 2021-2022, respectively. The SFA Director survey will focus on the financial impacts of the COVID-19 pandemic and program operations during SYs 2020-2021 and 2021-2022. Specifically, this study will help FNS obtain:

1. General descriptive data on the characteristics of CN programs to inform the budget process and answer questions about topics of current policy interest;
2. Data on program operations to identify potential topics for training and technical assistance for SFAs and SAs responsible for administering the CN programs;
3. Administrative data to identify program trends and predictors;
4. Information on the use and effectiveness of the CN COVID-19 waivers.

As indicated in Appendix B, Research Questions and Waiver List, the SY 2021-2022 and SY 2022-2023 SMO data collections will address research questions in five primary topic areas: (1) school and site participation, (2) child participation, (3) program operations, (4) financial management, and (5) the nationwide CN COVID-19 waivers (listed in Appendix B). This ICR covers the burden associated with the reporting for all CN COVID-19 nationwide waivers listed in Appendix B. The burden associated with reporting for any additional SY 2021-2022 nationwide waivers that are published prior to the summer 2022 web survey with State agencies will be submitted for OMB approval via a revision or non-substantive change memorandum, as

necessary, prior to the summer 2022 collection. Survey questions added to satisfy the reporting requirements associated with any such waivers will be consistent with the questions currently included in the State Agency Child Nutrition Director Survey Summer 2022 (Appendix D.3). In regards to the nationwide waivers, FNS intends to submit a non-substantive change request to OMB control number 0584-0654, FNS Information Collection Needs due to COVID-19, expiration date 1/31/2022 to seek OMB approval for all other burden associated with them.

### **Legal or Administrative Requirements**

This study is necessary to implement Section 28(a)(1) of the Richard B. Russell National School Lunch Act (NSLA), which authorizes the USDA Secretary to conduct annual national performance assessments of the school meal programs and requires States and local entities participating in the programs to cooperate with program research and evaluations (Appendix C). Furthermore, Section 305 of the 2010 Healthy Hunger-Free Kids Act (HHFKA) amended Section 28 of the NSLA by adding the following:

“(c) COOPERATION WITH PROGRAM RESEARCH AND EVALUATION.

—States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts.”

In addition, some of the study’s research questions (Appendix B) correspond to the statutory SA reporting requirements for the nationwide CN COVID-19 waivers. Section 2202(d) of the FFCRA (P.L. 116-127) requires any SA that elects to use a CN nationwide waiver to submit a report not later than 1 year after electing to use the waiver that, at a



minimum, summarizes the use of such waiver and describes how the waiver resulted in improved services to Program participants (Appendix A). The SMO Study will work as a streamlined data collection aimed to satisfy the congressionally-mandated reporting requirements from SAs for nationwide CN COVID-19 waivers used during SY 2020-2021 and SY 2021-2022. These requirements include:

1. a summary of the use of each waiver by the SA and local program operators, and
2. a description of whether each waiver resulted in improved services to children.

## **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.**

As summarized above and in Table A2.2 below, this study will collect disaggregated administrative data from State agencies and web survey data from State agencies and SFAs in order to better understand and describe CN Program operations and the financial impacts of the pandemic on local program operators and to meet the FFCRA-mandated reporting requirements for the nationwide CN COVID-19 waivers used during SY 2020-2021 and SY 2021-2022.

### **How the information is to be used**

The information collected through the SMO Study will be used to inform the budget process, describe and assess CN program operations, provide input for legislation and regulations on the CN programs, and develop pertinent technical assistance and training for program staff at the State and SFA levels. In addition, the data collected will be used to fulfill the mandatory reporting requirements for the nationwide CN COVID-19 waivers approved by FNS under the FFCRA for SYs 2020-2021 and 2021-2022 (FYs 21 and 22), just as the information previously collected through the SMO Study was used to meet States' statutory reporting requirements for

the nationwide CN COVID-19 waivers in use between March and September 2020 (FY 20). The data will allow FNS to assess meal service levels to determine coverage within and across States, look for patterns and trends across site types, and assess how the waivers were used and how they improved services to children since, in the absence of these waivers, meal service may not have been possible. Additionally, the information will inform FNS's planning, policy, and guidance related to state and local meal service operations during future emergency situations and unanticipated school closures.

### **From whom the information will be collected**

The information will be collected from a census of the 67 SAs that oversee the NSLP, SBP, SFSP, and CACFP in the 50 States, District of Columbia, Guam, Puerto Rico, and U.S. Virgin Islands<sup>1</sup>, and a nationally representative sample of 1,266 SFA directors. While this study has historically only collected data from public SFAs, all SFAs except those associated with Federally-administered schools will be included in the sample frame for this collection so that FNS may obtain a more comprehensive picture of CN Program operations during the pandemic. Participation in this collection is mandatory for States and SFAs under the terms of the FFCRA waivers and the NSLA (as amended by Section 305 of HHFKA).

### **How the information will be collected**

The SMO Study's data collection for the second and third collections (referred to in study materials as SMO II and SMO III; see Table A2.1) will be comprised of the following parts (summarized in Tables A2.1 and A2.2):

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<sup>1</sup> There are a total of 67 unique SAs included in the collection. In some States, FNS Child Nutrition Programs are administered by multiple agencies. Across the States and Territories included in the collection, there are 56 SAs that administer the NSLP, SBP, or SSO, which reflects an increase of 1 SA from the SY 2020-2021 data collection; 53 SAs that administer the SFSP; and 55 SAs that administer the CACFP. Thus, the number of SAs asked to complete the administrative data requests for the disaggregated FNS-10 (NSLP/SBP), FNS-418 (SFSP) and FNS-44 (CACFP) data will range from 53-56.

(1) two web-based State Agency Child Nutrition Director Surveys (Appendices D.1-D.4), conducted at the beginning and end of SY 2021-2022 (Fall 2021 and Summer 2022) to meet the statutory reporting requirements of the CN COVID-19 waivers separately for SY 2020-21 and SY 2021-22 within the one-year timelines set by the FFCRA;

(2) two administrative data collections (Appendices E.1-E.3), one conducted in SY 2021-2022 and the other in SY 2022-2023 (covering FYs 21 and 22); and

(3) a web-based School Food Authority Director Survey (Appendix F.1-F.2) conducted in SY 2021-2022 (Winter 2021/2022) and covering local program operations during SYs 2020-21 and 2021-22.

**Table A2.1. SMO II and III Components**

Collection	Timeframe	Data collection component	Topic(s)
<b>SMO II</b>	Fall 2021	SA web survey	SY 2020-2021 and Summer 2021 nationwide waivers
	Winter 2021/2022	SFA web survey	Meal operations and financial challenges in SYs 2020-2021 and 2021-2022
	Spring 2022	SA administrative data request	Disaggregated FY 2021 data (FNS-10, FNS-44, and FNS-418)
<b>SMO III</b>	Summer 2022	SA web survey	SY 2021-2022 nationwide waivers
	Spring 2023	SA administrative data request	Disaggregated FY 2022 data (FNS-10, FNS-44, and FNS-418)

The surveys will consist of questions and response options relevant to the research questions (Appendix B), and will ask about the use and impacts of the CN COVID-19 waivers during SYs 2020-2021 and 2021-2022, as well as SFA program operations and financial impacts of the COVID-19 pandemic on SFAs. The administrative data collection portion of the study will request disaggregated administrative data from SAs that local program operators regularly report to SAs for forms FNS-10 Report of School Program Operations, FNS-418 Report of the Summer Food Service Program for Children, and FNS-44 Report of the Child and Adult Care Food Program (jointly approved under OMB control

number 0584-0594, Food Programs Reporting System (FPRS), expiration date 07/31/2023),  
but that are not otherwise reported to FNS in disaggregated form.

**Table A2.2. Summary of SMO Data Collection Activities for SY 2021-2022 and SY 2022-2023**

Instrument	Sample/ Respondents	Method of Collection	Length	Purpose	Frequency	Data Collection School Year	Data Collection Period
<b>State Agency Child Nutrition Director Survey (Appendix D.1-D.4)</b>	67 State agency directors	Web survey	6 hours	To describe use and impacts of the nationwide CN COVID-19 waivers in use during SYs 2020-2021 and 2021-2022	Twice	2021-2022	Fall 2021, Summer 2022
<b>FNS-10 Administrative Data Request (Appendix E.1)</b>	56 State agency directors that oversee NSLP/SBP/SSO	Secure electronic transfer	6 hours	To provide meal claims data at the school or SFA level for the NSLP (including SSO) and SBP in fiscal years 2021 and 2022	Twice	2021-2022, 2022-2023	Spring 2022, Spring 2023
<b>FNS-418 Administrative Data Request (Appendix E.2)</b>	53 State agency directors that oversee SFSP	Secure electronic transfer	4 hours	To provide meal claims data at the site or sponsor level for the SFSP in fiscal years 2021 and 2022	Twice	2021-2022, 2022-2023	Spring 2022, Spring 2023
<b>FNS-44 Administrative Data Request (Appendix E.3)</b>	55 State agency directors that oversee CACFP	Secure electronic transfer	6 hours	To provide meal claims data at the outlet or institution level for the CACFP in fiscal years 2021 and 2022	Twice	2021-2022, 2022-2023	Spring 2022, Spring 2023
<b>School Food Authority Director Survey (Appendix F.1-F.2)</b>	1,266 school food authority directors	Web survey	1 hour	To describe SFA program operations during SYs 2020-2021 and 2021-2022 and financial impacts of the COVID-19 pandemic	Once	2021-2022	Winter 2021/2022

Upon OMB approval, FNS headquarters will send a notification to FNS Regional Offices (Appendix G.1) to introduce the SMO Study data collection activities for SYs 2021-2022 and 2022-2023 and ask FNS Regional Office (RO) staff to inform SAs about the upcoming data collections. To encourage SAs to cooperate with information requests, all FNS ROs will send the Study Support Email from FNS RO to SA (Appendix G.2) to alert the State CN directors in their region about their important role in the SMO Study during SYs 2021-2022 and 2022-2023. At the start of the SMO II and SMO III data collections (see Table A2.1), all State CN directors will be sent the SA Advance Email (Appendix G.3) and Brochure (Appendix G.4) that explain the purpose of the study and describe study activities. The study team will follow the same procedures as previously approved to collect the disaggregated administrative data from States. The only difference is that the State agencies have already completed memoranda of understanding (MOUs) with the research team as part of the previous collection and will not be asked to do so again as part of the new collection. To request the administrative data, the study team will provide State CN directors with the list of data elements that are being requested from the FNS-10, FNS-418, and FNS-44 Administrative Data Request forms (Appendices E.1-E.3), in spring 2022 and spring 2023 respectively, and schedule and conduct phone calls using the Telephone Meeting Advance Email and Call Script (Appendix G.5). Because the SY 2021-2022 and SY 2022-2023 data requests will be generally the same as the request for SY 2020-2021, it is expected that SAs will be familiar with the request. Using the FNS-10, FNS-418, and FNS-44 Administrative Data Request forms (Appendices E.1-E.3), the study team will request disaggregated FNS-10, FNS-418, and FNS-44 data annually (two times total) for fiscal years 2021 and 2022. Based on the data received through the previous SMO collection, it is expected that SAs will have these data available at the school, site, or outlet levels, or at the SFA, sponsor, or institution levels. For each administrative data

collection instrument, the study team will initially request school-, site-, or outlet-level data from SAs. If a SA does not have these data available, the team will request SFA-, sponsor-, or institution-level data from that SA. While the FNS-10, FNS-418, and FNS-44 Administrative Data Request instruments in Appendices E.1-E.3 include requests at both levels (school/site/outlet and SFA/sponsor/institution), each SA will only receive the request at the level for which they are able to provide the data (based on what they indicate during the initial telephone meeting). The FNS-10, FNS-418, and FNS-44 Administrative Data Request instruments will link each data element to the corresponding item number on the FNS-10, FNS-418, and FNS-44 forms. The FNS-10, FNS-418, and FNS-44 variables assist in addressing the research questions related to school and site participation, as well as children's program participation.

In addition, the study team will distribute web-based State Agency Child Nutrition Director Surveys twice (Appendices D.1-D.4) and the School Food Authority Director Survey once (Appendices F.1-F.2). These surveys each address research questions that cannot be answered using the FNS-10, FNS-418, and FNS-44 administrative data.

All State CN directors will be asked to complete two web surveys: one in fall 2021, covering the COVID-19 CN nationwide waivers used in SY 2020-2021 and summer 2021, and one in summer 2022, covering the nationwide waivers used in SY 2021-2022. The study team will follow the same procedures as outlined in the previously approved ICR for the State survey collections. For each survey, State CN directors will be sent the SA Invitation Email (Appendix G.6) requesting that they complete the survey and providing instructions on how to access it. Reminder Emails (Appendix G.7) will be sent every 2-3 weeks to remind State CN directors to complete their surveys. FNS expects each State to receive, on average, 2 reminder emails per survey (for a total of 4 reminder emails across the SMO II and SMO III collections). If the web survey is not completed within 7 weeks after the initial questionnaire is made

available to the agency contact, trained interviewers will begin calling State CN directors to remind them to complete their survey using the Telephone Reminder Script (Appendix G.8). Toward the end of the field period, all SA non-respondents will be mailed the SA Last Chance Post Card (Appendix G.9). The data collection period for each State Child Nutrition Director Survey will span 10 weeks. Based on experience with the previously approved collection in SY 2020-2021, and because the collection is mandatory, FNS anticipates that all 67 SAs will ultimately respond.

The SA Advance Email (Appendix G.3) sent to all State CN directors prior to the SMO II collection in fall 2021 will notify the SAs that the study team will soon contact selected SFAs for the winter 2021/2022 SFA survey and will request that State CN directors encourage cooperation by sending the Study Support Email from SA to SFA (Appendix G.10) to SFA directors. All selected SFA directors will then be sent the SFA Advance Letter (Appendix G.11) and Brochure (G.4) that explain the purpose of the study and describe study activities, followed by the SFA Invitation Email (Appendix G.12) requesting that they complete the survey and providing instructions on how to access it. Reminder Emails (Appendix G.7) will be sent every 2-3 weeks to remind SFA directors to complete their surveys. FNS expects most SFAs to receive, on average, 2 reminder emails. If the web survey is not completed within 7 weeks after the initial questionnaire is received, trained interviewers will begin calling SFA directors to remind them to complete their survey using the Telephone Reminder Script (Appendix G.8). Toward the end of the field period, all SFA non-respondents will be mailed the SFA Last Chance Post Card (Appendix G.13). The data collection period for the School Food Authority Director Survey will span 10 weeks. FNS anticipates that 1,012 SFAs (80% of sampled SFAs) will ultimately respond.

In SY 2020-2021, the SMO Study collected information from SAs through a web-based survey and the collection of disaggregated administrative data reported on Forms FNS-10, FNS-418, and FNS-44. Because the previous SMO approval only included one state-level survey and administrative data



collection, the study burden has increased with this revision with the addition of a second SA survey, a second administrative data collection, and the SFA survey instrument and associated burden. With these additions, as well as a pretest of the SFA survey with 6 SFAs not included in the survey sample, there are approximately 1,272 more respondents, 9,301 more responses, and 2,943 more burden hours in the SY 2021-2022 and 2022-2023 data collections than were previously approved in the study.

### **Frequency of data collection**

This information request is for two web-based SA surveys, collected in fall 2021 and summer 2022, and two collections of FNS-10, FNS-418, and FNS-44 disaggregated administrative data from SAs covering FYs 2021 and 2022. A web-based SFA survey will be collected once during SY 2021–2022.

### **Information shared with any other organizations inside or outside USDA or the government**

As in most FNS data collection efforts, data files and documentation will be prepared for restricted-use (for researchers who agree to specific restrictions), and for public-use (with some masking of data to avoid identifying individual respondents). While no local program operators will be identifiable in the reports or data, some analyses may identify specific States in the final dissemination products, which will be made publicly available in the research section of the USDA FNS website,

<http://www.fns.usda.gov/ops/research-and-analysis>.

### **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. The team will administer web surveys to SAs and SFAs using the Conformat web survey platform. Online surveys enable efficient survey participation, as programming limits questions to relevant

respondents and will constrain data ranges, keeping responses within a certain length and simplifying data cleaning. Web surveys also allow respondents to complete and submit data securely using unique, password-protected logins.

Professional survey support specialists will be available during regular business hours to assist State CN directors and SFA directors completing a web survey. Respondents may save their progress, facilitating completion of the survey in more than one session. As needed, survey support specialists will be able to complete any modules that the respondent would like to complete over the phone using the respondent's unique web survey link. Based on experience conducting web surveys and supporting the completion of web surveys by phone, the study team expects that all 67 State respondents and the expected 1,012 responding SFAs will complete the surveys on-line.

The FNS-10, FNS-418, and FNS-44 Administrative Data Requests will also be collected electronically using a secure transfer site. To encourage high response rates, the study team will inform SFAs that they may submit these data in whatever form is most convenient for them given the variety of systems and databases used by States nationwide. Accepting these data electronically also enables the study team to adhere to proper social distancing protocols, as requested by public commenters. The team estimates that out of a total of 10,015 responses for this study, 1,474 responses (15%) will be collected electronically.

#### **A4. Efforts to Identify Duplication and Use of Similar Information**

**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 has made every effort to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private

agencies. The approach used by this study, of requesting disaggregated FNS-10, FNS-418, and FNS-44 data, is intended specifically to reduce duplicative reporting. These data are not currently collected on any FNS administrative forms at the SFA, school, sponsor, site, institution, or outlet levels; however, SFAs, sponsors, and institutions regularly report these data to their States. States aggregate these data to report State-level meal claims information to FNS through the FNS-10, FNS-418, and FNS-44. Data of this type have been collected under previous studies but not within the framework or timeline of the current research questions.

## **A5. Impacts 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.**

Information being requested or required has been held to the minimum required for the intended use. Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. FNS estimates that out of the total 1,339 respondents for this collection, that 74 percent of our respondents are small entities (school districts with less than 50,000 students)<sup>2</sup>, representing approximately 990 respondents.

## **A6. Consequences of Collecting the Information Less Frequently**

**Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This revision to the School Meals Operation Study is a mandatory data collection for both SAs and SFAs under the terms of the FFCRA and the NSLA. The CN programs operate in each State and Territory and represent an annual investment of more than \$20 billion of Federal funds. To manage

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<sup>2</sup> According to OMB Form 83-I, “a small government entity may be... a jurisdiction which is a... government of a city, county, town, township, school district, or special district with a population of less than 50,000.” Nearly all SFAs qualify as small SFAs under this definition.

these programs effectively and to comply with statutory and regulatory requirements, FNS must collect and analyze data regarding program operations at the State and local levels. FNS also has many one-time information needs, including those to address current policy issues associated with these programs, which cannot be answered with existing program data. This includes congressionally-mandated information on the use and effectiveness of the nationwide CN COVID-19 waivers used during SY 2020-2021 and SY 2021-2022, and information about the effects of the pandemic and the COVID-19 waivers on local program operators. This information will be collected through one SFA survey and two SA surveys covering SYs 2020-2021 and 2021-2022, as well as two administrative data collections in SYs 2021-2022 and 2022-2023 (covering FYs 21 and 22), respectively. The State-level surveys and administrative data collections will be used to satisfy States' statutory reporting requirements under the FFCRA. Collecting these data less frequently would make it harder for States to meet their statutory reporting requirements and would not allow FNS to properly monitor program funding, statutory and regulatory compliance, and program trends, thus delaying the discussion, formulation, and implementation of suitable program policies, training, and technical assistance.

## **A7. Special Circumstances Relating to the Guideline of 1320.5(D)(2)**

**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 in Response to the *Federal Register* Notice and Efforts to Consult with Persons Outside the Agency**

**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.**

### **Federal Register notice**

A notice of this study was published in the *Federal Register* on April 21, 2021, Volume 86, Number 75, pages 20654-20658. The public comment period ended on June 21, 2021. A total of nine comments were received, eight of which were unique (Appendices H.1-H.9). Of the eight unique comments, three of the comments were not germane to the study and therefore no specific FNS response is provided. Two of the commenters expressed support for the study and the nationwide waivers broadly. FNS thanks them for their support and input. The other three commenters, representing stakeholder agencies, suggested reducing the burden of the data collection on State agencies and SFA directors through various approaches, such as by allowing State agencies to provide administrative data in its current

format, streamlining survey questions about the waivers, and providing advanced notice of the types of information that will be collected on the waivers. Two commenters also suggested collecting additional information through the surveys on the waiver implementation process.

In response to commenters who suggested various approaches for reducing data collection burden, FNS noted that State agencies are encouraged to submit their administrative data in the format they have available and that steps have been taken to balance the agency's informational needs with efforts to minimize respondent burden for the upcoming SMO collection. FNS specifically noted that a concerted effort has been made to streamline the instruments for the upcoming SMO collection in response to the feedback obtained, and clarified that, where possible, administrative data will be used to answer research questions in order to decrease burden on study participants. In response to suggestions regarding additional information that could be collected with the state-level survey, FNS expressed appreciation for the suggestions but noted that because of the focus on decreasing burden associated with the data collection, the surveys cannot cover all topics of interest and must focus on those needed to satisfy congressionally-mandated reporting requirements.

Additionally, consistent with their comment on the previous information collection request, the School Nutrition Association (SNA) again recommended that FNS convene a commission to evaluate the processes and practices used during the COVID-19 pandemic to develop a national playbook on school meal operations in emergency situations (Appendix H.5). In our response (Appendix H.13), FNS noted that, while convening a commission is outside the scope of this study, findings from the School Meals Operations Study will inform future CN program policies and procedures.

Public comments are listed in Appendices H.1-H.9 and FNS responses are listed in Appendices H.10-H.16. FNS was not able to respond to one of the commenters due to lack of contact information provided.

## Expert Consultation

In addition to soliciting public comment, FNS consulted with Doug Kilburg from the National Agricultural Statistics Service (NASS) for expert consultation on the study design and methodology. National Agricultural Statistics Service Comments are listed in Appendix I.1, and the FNS Response to National Agricultural Statistics Service Comments is available in Appendix I.2. Further, three State CN directors were consulted about the burden, clarity of instructions, and content of the State surveys, and six SFA directors pre-tested the SFA survey and provided feedback. With their permission, their names and contact information are listed in Table A8.1.

Overall, reviewers of the State CN Director Survey found the survey to be generally easy to understand, and they appreciated that the format and questions are similar to the first SMO SA survey, as they expect that to ease survey response. Reviewers also indicated that the changes made to simplify response options and clarify instructions should also ease survey response.

Reviewers of the SFA Director Survey found the survey to be straightforward and generally easy to complete. They provided feedback on the wording of some questions and offered suggestions for additional response options. Five of the six reviewers were able to complete the survey within the target burden estimate of 60 minutes. Adjustments made to the collection in response to expert comments are summarized in Part B, Question 4 and in Appendix M.

**Table A8.1. Expert Consultant List**

Name	Title	Affiliation	Phone	Year of consultation
Kerri Link	Nutrition Programs Review Supervisor	Colorado Department of Education	720-660-5499	2021
Catherine Wright Steele	Administrator	Texas Department of Agriculture	512-463-2164	2021
Cheryl Johnson	Director	Kansas Department of Education	785-296-2276	2021
Dana Bigham	Director, Child Nutrition	Victoria ISD (TX)	361-788-9235	2021
Laura Fails	Food Service Director	Wamego USD 320 (KS)	785-458-7801	2021
Susan Anderson	Director of Nutrition	Weld RE-4 School District (CO)	720-480-0693	2021

	Services			
Amy Faricy	Manager of Menu Services	Douglas County School District (CO)	303-387-0301	2021
Mike Boone	Director of Child Nutrition	San Marcos CISD (TX)	512-393-6940	2021
Cynthia Bravo	Finance Manager	Northside ISD (TX)	210-397-4506	2021

## **A9. Explanation of Any Payments or Gifts to Respondents**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Respondents will not receive any incentive payments or gifts.

## **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 complies with the Privacy Act of 1974. No confidential information is associated with this collection of information. FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* (volume 56, pp. 19078–19080) on April 25, 1991. This notice discusses the terms of protections that will be provided to respondents.

To be responsive to FNS requirements regarding respondent protections, research staff will sign the Confidentiality Pledge (Appendix J) and participate in annual security awareness training. Access to the data will be limited to members of the study team working directly on the study or with oversight responsibilities, except as otherwise required by law.

The study team will ensure that data are secure by providing a secure transfer site for administrative data from States and storing all study data in a restricted access project directory on a password-protected local area network. SAs will be assured that the information they provide will not be released in a way that compromises privacy or data security.



The web surveys will be developed in Conconfirm, a computer-assisted survey software package developed by the company of the same name, and all data will be stored securely within this system. Through Conconfirm, unique user credentials (ID and Password) are created for each survey participant. Each participant will be assigned to a copy of the instrument. Access to the instrument is provided via a URL sent to the participant's email account. The URL will contain an embedded hashed ID and Password for the participant. When the participant clicks on the URL, they will be automatically directed to the website and authenticated into the instrument. All data captured through Conconfirm, will be stored in a study-specific folder that is encrypted with AES 256-bit encryption on the Conconfirm server. All access to this data is controlled by Active Directory groups on Mathematica's Domain Network. Each study team member must have valid credentials to access the Conconfirm data stored in restricted access folders. While none are expected, any hard-copy documents submitted will be physically secured in locked storage cabinets and shredded at the close of the study.

Personally identifiable information (PII) will not be used to retrieve survey records or data. Neither the survey nor the other data collection materials in this collection require a Privacy Act Statement. Contact information will be stored with the other study data in a restricted access project directory on a password-protected local area network and will not be shared outside the study team.

The FNS Privacy Officer reviewed this ICR for privacy compliance on July 12, 2021 and had no privacy concerns.

## **A11. Justification for Sensitive Questions**

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

This information collection does not include any questions of a sensitive nature.

## **A12. Estimates of Hour Burden Including Annualized Hourly Costs**

**Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

**A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

This is a revision of a currently approved collection. With this submission, there are 1,339 respondents (1,085 respondents and 254 non-respondents), 10,015 responses (7,387 respondents and 2,628 non-respondents, and 4,115.54 burden hours (3,974.44 for respondents and 141.10 for non-respondents). The average number of responses per respondent is 6.81 and the average number of responses per non-respondent is 10.34. Across all participants in the collection, the average number of responses is 7.48. Table A12.1, Estimated Annualized Burden and Appendix K, shows the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials, outside consultants, affected stakeholders, and prior experience in collecting similar data.

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

The estimates of annualized costs to State and local governments and private, not for profit businesses are based on the burden estimates and utilize the U.S. Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational and Wage Statistics for Occupational Groups 999200: State Government ([https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm)) and 611000: Elementary and Secondary Schools ([http://www.bls.gov/oes/current/naics4\\_611100.htm](http://www.bls.gov/oes/current/naics4_611100.htm)). Annualized costs are based on

the mean hourly wage. The estimated annualized cost for State government, which includes State CN directors (Occupation Code 11-9030, Education Administrators), is \$129,804.16 ( $\$48.02/\text{hr.} \times 2,703.13$  hours). The estimated cost of this data collection for local government, which includes SFA directors in public schools (Occupation Code 11-9039, Education Administrators, All Other), is \$54,901.64 ( $\$47.10/\text{hr.} \times 1,165.64$  hours). The estimated cost of this data collection for private, not for profit businesses, which includes SFA directors in private schools (Occupation Code 11-9039, Education Administrators, All Other), is \$11,622.87 ( $\$47.10/\text{hour} \times 246.77$  hours). Including an additional \$64,788.44 to account for fully loaded wage rates ( $\$196,328.61 \times 0.33$ ), the estimated annualized total cost to respondents associated with this collection is \$261,117.06.<sup>3</sup>

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<sup>3</sup> These calculations have been adjusted to reflect the totals in the burden table (Table A12.1 and Appendix K). Minor differences between the amounts displayed and the results of the calculations shown are due to rounding.

Table A12.1 Estimated Annualized Burden

Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-Responsive					All	All	All
				Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Total Annual hour burden	Hourly Wage Rate	Total annualized cost of respondent burden
State Agency Directors	Web survey and administrative data pre-test and debrief	M	3	3	2	6	2	12	0	0	0	0	0	12.00	\$48.02	\$576.24
	Study support email (from FNS RO to SA)	G.2	67	67	2	134	0.0501	6.71	0	0	0	0	0	6.71	\$48.02	\$322.38
	Study support email (from SA to SFA)	G.10	67	67	1	67	0.33	22.11	0	0	0	0	0	22.11	\$48.02	\$1,061.72
	SA Advance emails	G.3	67	67	2	134	0.0501	6.71	0	0	0	0	0	6.71	\$48.02	\$322.38
	Telephone meeting Advance Email and call script	G.5	67	67	2	134	0.5	67	0	0	0	0	0	67.00	\$48.02	\$3,217.34
	FNS-10 Administrative Data Request for FY 2021 and FY 2022	E.1	56	56	2	112	6	672	0	0	0	0	0	672.00	\$48.02	\$32,269.44
	FNS-418 Administrative Data Request for FY 2021 and FY 2022	E.2	53	53	2	106	4	424	0	0	0	0	0	424.00	\$48.02	\$20,360.48
	FNS-44 Administrative Data Request for FY 2021 and FY 2022	E.3	55	55	2	110	6	660	0	0	0	0	0	660.00	\$48.02	\$31,693.20
	State Agency Child Nutrition Director Surveys (Fall 2021 and Summer 2022)	D.1-D.4	67	67	2	134	6	804	0	0	0	0	0	804.00	\$48.02	\$38,608.08
	Brochure	G.4	67	67	2	134	0.0501	6.71	0	0	0	0	0	6.71	\$48.02	\$322.38
	SA Invitation email	G.6	67	67	2	134	0.0501	6.71	0	0	0	0	0	6.71	\$48.02	\$322.38
	Reminder email	G.7	67	67	4	268	0.0501	13.43	0	0	0	0	0	13.43	\$48.02	\$644.75
	Telephone reminder script	G.8	8	8	2	16	0.0835	1.336	0	0	0	0	0	1.34	\$48.02	\$64.15
	SA Last chance post card	G.9	4	4	2	8	0.0501	0.4008	0	0	0	0	0	0.40	\$48.02	\$19.25
SFA Directors	Web survey pre-test & debrief	M	6	6	1	6	2	12	0	0	0	0	0	12.00	\$47.10	\$565.20
	Study support email (from SA to SFA)	G.10	1,042	1,042	1	1042	0.0501	52.20	0	0	0	0	0	52.20	\$47.10	\$2,458.82
	SFA Advance letter	G.11	1,042	834	1	834	0.0501	41.78	208	1	208	0.0501	10.42	52.20	\$47.10	\$2,458.82

Part A School meals operations study

Table 12.1 (continued)

	School Food Authority Director Survey 2021-2022	F.1-F.2	1,042	834	1	834	1	834	208	1	208	0.0501	10.42	844.42	\$47.10	\$39,772.22
	Brochure	G.4	1,042	834	1	834	0.0501	41.78	208	1	208	0.0501	10.42	52.20	\$47.10	\$2,458.82
	SFA Invitation email	G.12	1,042	261	1	261	0.0501	13.08	781	1	781	0.0501	39.13	52.20	\$47.10	\$2,458.82
	Reminder email	G.7	781	469	2	938	0.0501	46.99	312	1	312	0.0501	15.63	62.63	\$47.10	\$2,949.64
	Telephone reminder script	G.8	312	78	1	78	0.0835	6.51	234	1	234	0.0835	19.54	26.05	\$47.10	\$1,227.05
	SFA Last chance post card	G.13	234	26	1	26	0.0501	1.30	208	1	208	0.0501	10.42	11.72	\$47.10	\$552.17
	<b>State and Local Governments Subtotal</b>		<b>1,115</b>	<b>907</b>	<b>7.00</b>	<b>6,350</b>	<b>0.5910</b>	<b>3,752.78</b>	<b>208</b>	<b>10.38</b>	<b>2,159</b>	<b>0.0537</b>	<b>115.98</b>	<b>3868.77</b>		<b>\$184,705.72</b>
Private, Not For Profit	Study support email (from SA to SFA)	G.10	224	224	1	224	0.0501	11.22	0	0	0	0	0	11.22	\$47.10	\$528.58
	SFA Advance letter	G.11	224	178	1	178	0.0501	8.92	46	1	46	0.0501	2.30	11.22	\$47.10	\$528.58
	School Food Authority Director Survey 2021-2022	F.1-F.2	224	178	1	178	1	178.00	46	1	46	0.0501	2.30	180.30	\$47.10	\$8,492.35
	Brochure	G.4	224	178	1	178	0.0501	8.92	46	1	46	0.0501	2.30	11.22	\$47.10	\$528.58
	SFA Invitation email	G.12	224	56	1	56	0.0501	2.81	168	1	168	0.0501	8.42	11.22	\$47.10	\$528.58
	Reminder email	G.7	168	101	2	202	0.0501	10.12	67	1	67	0.0501	3.36	13.48	\$47.10	\$634.76
	Telephone reminder script	G.8	67	17	1	17	0.0835	1.42	50	1	50	0.0835	4.18	5.59	\$47.10	\$263.50
	SFA Last chance post card	G.13	50	5	1	5	0.0501	0.25	45	1	45	0.0501	2.25	2.51	\$47.10	\$117.99
	<b>Private, Not-For-Profit Businesses Subtotal</b>		<b>224</b>	<b>178</b>	<b>5.83</b>	<b>1,038</b>	<b>0.2135</b>	<b>221.65</b>	<b>46</b>	<b>10.17</b>	<b>468</b>	<b>0.0537</b>	<b>25.12</b>	<b>246.77</b>		<b>\$11,622.90</b>
	<b>TOTAL</b>		<b>1,339</b>	<b>1,085</b>	<b>6.81</b>	<b>7,388</b>	<b>0.538</b>	<b>3,974.44</b>	<b>254</b>	<b>10.34</b>	<b>2,627</b>	<b>0.054</b>	<b>141.10</b>	<b>4,115.54</b>		<b>\$196,328.61</b>
	<b>.33% to Account for Fully Loaded Wage Rate</b>															<b>\$64,788.44</b>
	<b>TOTAL REPORTING BURDEN (Fully Loaded)</b>															<b>\$261,117.06</b>

Notes:

E4 & F4 - State level pretest respondents are included in the overall State sample of 67 so are not considered unique respondents for the purpose of calculating total sample size or total number of respondents.

F14-F17 - Assumes all SAs will respond to the invitation and reminder emails but that a few will require a follow-up phone call and/or post card to fully complete and submit the data collection instruments

F21 and F31 - Assumes an 80% survey response rate

F23 and F33 - Assumes an initial response rate of 25%, with the initial nonrespondents receiving reminder emails

K38 - Includes only those expected to never respond

### **A13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

**Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

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

### **A14. 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 total annualized cost to the Federal government is \$719,116.66. The largest cost to the Federal Government is to pay a contractor \$2,415,204 over a period of 42 months (September 2020 to March 2024) to conduct the study and deliver data files and reports. This represents an average annualized cost of \$690,058.29 including labor and other direct and indirect costs. The annualized cost of this information collection also assumes a total of 400 hours annually of Federal employee time: for a GS-12, Step 6 at \$48.75 per hour for a total of \$19,500. In addition, we assume 40 hours annually for the Branch Chief, at GS-14, Step 1, at \$58.71 per hour for a total annual cost of \$2,348.40. Adding in \$7,209.97 to account for fully loaded wages ( $\$21,848.40 \times 0.33$ ), total Federal employee costs per year are thus estimated at \$29,058.37. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2021 for the Washington, DC locality (Office of Personnel Management. 2021. Salary table 2021-GS. Retrieved from [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)).

## **A15. Explanation for Program Changes or Adjustments**

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

This is a revision of the approved collection for the SMO Study (OMB Control No. 0584-0607 School Meals Operations Study: State Agency COVID-19 Child Nutrition Waivers Evaluation, expiration date: 08/31/2022). This information collection is currently approved with 1,173 burden hours and 714 responses. FNS has revised this study to update data collection topics and instruments for the SY 2021-2022 and SY 2022-2023 data collections, which will include two state-level administrative data collections, two online surveys of State CN directors, and one online survey of SFA directors, which was cancelled for the SY 2020-2021 collection due to COVID-19. Information from this collection will again be used to meet States' statutory reporting requirements on the COVID-19 CN nationwide waivers under FFCRA. With these changes, FNS plans to add 1,272 SFA directors to the study. This includes the six SFA directors who participated in the pre-test of the School Food Authority Director Survey, in addition to the 1,266 SFA directors who will be contacted to take the SFA Director Survey.

Further, based on feedback provided by State agencies during the first SMO data collection and the survey pretests for this data collection, FNS is increasing the estimate of the State Child Nutrition Director survey burden from 3 to 6 hours (Appendices D.1-D.4). Although several changes have been made to decrease survey burden, including streamlining questions, clarifying instructions, and simplifying response options, FNS has increased the estimated time to take this survey to account for the additional time that it may take States to gather the information needed to respond to the survey. While the average time spent actually completing the first SMO web survey in spring 2021 was around 3-4 hours and varied widely among respondents, several SAs indicated that the 3 hour burden estimate did not adequately account for the time required for SAs to organize and compile the information needed

to accurately answer the survey questions. Thus, to honor this feedback and better reflect the wide variation in time needed across States, FNS has doubled the burden estimate for this instrument for the upcoming State survey collections. FNS lowered the burden estimate for the Telephone Meeting Advance Email and Call Script (Appendix G.5), however, from 1 hour as previously approved to 30 minutes. Because all SAs submitted similar information in the first SMO collection and are therefore expected to be familiar with the administrative data requests already, FNS anticipates less time needed on the initial call.

Altogether, these program changes, including changes to the burden estimates for select instruments and the addition of the second web-based survey and pretest of State CN directors, a second administrative data collection, and the SFA Director survey for SY 2021-2022 (and all recruitment instruments associated with these activities), added 1,272 more respondents, 9,299 more responses, and 2,931 more burden hours than approved in the previous SMO collection. Additionally, an adjustment was made to increase the number of respondents to the FNS-10 administrative data request by 1 (totaling 2 additional responses and 12 additional burden hours for this collection) after learning during the first SMO data collection about an additional State for which two agencies separately will provide the FNS-10 data.

As a result of these program changes and adjustments, FNS estimates that this information collection will have 4,116 burden hours and 10,015 responses, which is 2,943 more burden hours and 9,301 more responses than previously approved.

## **A16. Plans for Tabulations and Publication and Project Time Schedule**

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

**Study schedule.** The planned schedule for the activities in the study is as follows:



**Table A16.1 Data collection schedule**

Recruitment of States and SFAs	1 week post OMB approval
State Agency Survey Data Collections	October 2021 – December 2021, or 2 weeks post OMB approval, and June 2022 – August 2022
SFA Director Survey Data Collection	January 2022-March 2022
Administrative Data Collection	March 2022 – May 2022 March 2023 – May 2023
Prepare Data Files	5 months following the start of data collections
Analyze Data	8 months following the start of data collections
Publication	13 months following the start of data collections

### **Analysis**

The analysis will address the research questions identified in Appendix B. The primary mode of analysis will be descriptive, including univariate statistics (means, medians, and frequencies) and cross tabulations. Analyses of administrative data will be at the State, SFA, school, sponsor, site, institution and outlet levels, if administrative data at the school, site, and outlet levels are available from SAs. Analyses of the State CN Director survey will be at the SA and waiver levels. All analyses of data from the SFA survey will be at the SFA level and incorporate analysis weights that account for selection probabilities and nonresponse patterns and will be calibrated to benchmark counts, such as those reported in the FNS-742 School Food Authority Verification Collection Report (OMB number 0584-0594, Food Programs Reporting System (FPRS), expiration date 07/21/2023) (Appendix L). For selected outcomes, the study team will test differences between key subgroups for statistical significance using two-tailed t-tests.

### **Plans for publication**

FNS will share study findings through potential products such as a summary of findings, data visualizations, or a study briefing. Final dissemination products will be available to the public on the FNS research website.

**A17. Display of Expiration Date for OMB Approval**

**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. Exception to the Certification Statement Identified in Item 19 of Form OMB 83-1**

**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.