

SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-NEW:
SFA Survey on School Food Supply Chain Disruption

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Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.
.....4

A2. PURPOSE AND USE OF THE INFORMATION.....5

A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....6

A4. EFFORTS TO IDENTIFY DUPLICATION.....6

A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....7

A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....7

A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....7

**A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR
CONSULTATION.....8**

**A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO
RESPONDENTS.....11**

A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....11

A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....12

A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION...12

A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....15

**A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.
.....15**

A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....15

A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE. 15

A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....16

A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....16

Appendices

Appendix A. Section 28 of the Richard B. Russell National School Lunch Act and Section 305 of the
Healthy, Hunger-Free Kids Act of 2010

Appendix B. SFA Survey on Supply Chain Disruption

Appendix C. SFA Contact Information Request

Appendix D. Survey Support Email

Appendix E. Reminder Email

Appendix F. Thank You Email

Appendix G. Pretest

Appendix H. Burden Table

Tables

Table 1. Pretest Participants.....9

Table 2. Annual Burden Estimate.....14

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 Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting emergency approval under the Paperwork Reduction Act (PRA) to conduct a survey of school food authorities (SFAs) to collect information on the impacts of COVID-19-related supply chain disruptions on the Child Nutrition (CN) Programs. FNS cannot reasonably comply with the normal clearance procedures under the PRA because complying would delay the agency's ability to provide emergency nutrition assistance to families and children who continue to be impacted by COVID-19. As such, we request expedited approval of this information collection.

FNS is the sole agency 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. Although FNS oversees these programs, State agencies (SAs) administer them through agreements with SFAs and other local entities that implement the programs at the local level. To inform current and future policy decisions and effectively oversee these programs, FNS requires information on how these programs are operating and the challenges local program operators are facing.

This collection is authorized under 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 A). 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.”

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 primary purpose of this information collection is to obtain data on the impacts of school food supply chain disruption on school districts and students nationwide via the SFA Survey on Supply Chain Disruption (Appendix B), which is a 20 question web survey of all 19,050 SFAs that operate the CN Programs. FNS will use the information obtained through this survey to develop tailored resources, tools and flexibilities to support school districts in serving students healthy and nutritious meals during this challenging time. This is a mandatory collection for both States and SFAs.

Prior to distributing the web survey, FNS must first collect SFA contact information from the 56 State CN agencies that administer the CN Programs at the state level in the 50 States, District of Columbia, Guam, Puerto Rico, and U.S. Virgin Islands. To do so, FNS will send SAs the SFA Contact Information Request email (Appendix C) with an attached spreadsheet to complete and return to FNS. SAs may also submit the information in other forms depending on the specific systems they use and their ability to export existing information. With the SFA Contact Information Request email, FNS will attach a Survey Support Email (Appendix D) and ask all SAs to distribute it to the SFAs in their respective States to let SFAs know that the survey is coming and to express their support for the collection.

FNS intends to collect data over a 4-week period. SFAs that have not yet completed their surveys will receive a reminder email (Appendix E) each week. FNS expects each SFA to receive 2 reminder emails, on average. Upon completion of the survey, FNS will send each SFA a thank you email

(Appendix F). Because supply chain disruption is an urgent issue affecting school districts nationwide and this short survey presents an opportunity for SFAs to communicate their challenges and frustrations directly to FNS, FNS expects all 19,050 SFAs to respond within this 4-week period.

FNS is requesting approval of this information collection through March 31, 2022.

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 the web survey to SFAs using the Qualtrics 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. Respondents may save their progress, facilitating completion of the survey in more than one session.

FNS estimates that out of a total of 95,371 responses for this study, 19,050 responses (20%) will be collected electronically.

A4. Efforts to identify duplication.

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

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 data we seek to collect are specific to the urgent and evolving supply chain situation SFAs are currently experiencing and, to our knowledge, these data are not currently

being collected elsewhere.

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.

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 19,106 respondents for this collection, 74 percent of our respondents are small entities (school districts with less than 50,000 students), representing approximately 14,138 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 is a one-time data collection that is necessary in order for FNS to fully understand the impacts that supply chain disruption is having on school districts' abilities to provide healthy and nutritious meals to students this school year. If FNS did not collect these data, FNS would not be able to provide the tailored resources, tools and flexibilities necessary for local program operators to continue providing reimbursable meals and snacks to children through the federal Child Nutrition Programs. Additionally, without this collection, FNS would not be able to accurately track and report on school food supply chain disruption to the Executive Office of the President.

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.**

This information collection is intended to assist with accurately tracking and reporting activity on school food supply chain disruption to the Executive Office of the President. Given the urgency of the issue and the need to identify potential solutions and flexibilities quickly, FNS is requesting that State CN Directors submit SFA contact information within 1 week of the request and that SFA Directors complete their web surveys within 4 weeks of receipt.

There are no other 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.

This is a request for emergency approval under the PRA. Due to the urgent and evolving supply chain situation and need to collect these data quickly, FNS was not able to post for public comment in the Federal Register. However, FNS consulted with 9 SFA Directors across all 7 FNS regions in October 2021 as part of the pretest (Appendix G) for the SFA Survey on Supply Chain Disruption. With permission, their names, titles, and contact information are listed in Table 1 below.

Table 1. Pretest Participants

Name	Title	State	Email
Becky Landes	Food Service Operations Manager, Manchester Community Schools	Indiana	Becky_Landes@mcs.k12.in.us
Adam Russo	Director, Office of School Food & Nutrition Services, Prince William County Public Schools	Virginia	russoat@pwcs.edu
Claire Delerno	Executive Director of Food Services, Jefferson Parish Schools	Louisiana	claire.delerno@jpschools.org
Barbara Bonnell	Nutrition Director, RSU 18	Maine	bbonnell@rsu18.org
Jane Zentko	District Food Service Director, Duval County Public Schools	Florida	ZentkoJ@duvalschools.org

Carlee McIntosh	Director of Food Services, Petersburg Borough School District	Alaska	cjohnson@pcsd.us
Jessa Youngers	Food Warehouse Supervisor, Great Falls Public Schools	Montana	jessa_youngers@gfps.k12.mt.us
Nicole Melia	Foodservice Supervisor, Great Valley School District	Pennsylvania	nmelia@gvgsd.org
Megan Barnard	Director of Food Service, USD 266 Maize	Kansas	mebarnard@usd266.com

Pretest participants reported spending from 5 to 30 minutes on the survey, with all but one finishing within the 20 minute estimate. All participants provided positive feedback on the overall content and structure of the survey, and suggested that the survey would be well-received by SFAs given its timeliness and ease of completion. While open-ended responses and the question about the extent of their current financial deficit (if applicable) took longer than other questions, most participants indicated that the 20 minute burden estimate was accurate and appreciated the opportunity to provide additional context via the open-ended responses when necessary. Participants largely thought that the response options offered were well-worded, understandable, and covered their situations well; however, a few made suggestions for items to add or alternative scales to use. Participants also suggested providing a “not applicable” option on a few questions.

The most prevalent issues reported during the pretest were with questions 1 and 2, which asked participants for their SFA ID numbers and to select the CN Programs that they have operated this school year. Most participants did not know their SFA ID numbers off the tops of their heads and many did not know where to find it. Additionally, they reported that it was unclear what time period they should report on for the CN Programs and whether they should select the National School Lunch and Breakfast Programs (NSLP/SBP) if they normally operate those programs but are using the nationwide waiver to provide breakfast and lunch under the NSLP Seamless Summer Option (SSO) this school year.

In response to participant feedback, FNS made the following changes to the survey:

- Supplemented the language in the introduction
- Removed Question 1 requesting SFA Name and ID – FNS will now get this information directly from State agencies, who have this information more readily available, as part of the SFA Contact Information Request (Appendix C)
- Clarified the time period and added instructional details to Question 2
- Switched the order of Questions 3 and 4 and removed an unnecessary descriptor from Question 3
- Slightly adjusted the wording of the question, response options and examples for Question 5
- Added a follow-up to Question 5 to assess changes in severity of the challenges reported over time
- Made small adjustments to wording/examples in Question 7
- Changed the response options for Question 8 regarding expected duration of challenges
- Added a N/A option to Questions 9 and 10 regarding use of USDA Foods and USDA DoD Fresh
- Added several response options to Questions 11 and 12 to better capture impacts challenges are having on SFAs and the methods participants reported using to address them
- Clarified example calculation in Question 17
- Added a N/A option to Question 19

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.

No payments or gifts are provided to respondents under this collection.

A10. Assurances of confidentiality provided to respondents.

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Department complies with the Privacy Act of 1974. No confidential information is associated with this collection of information and no such assurances of confidentiality are provided. This ICR does not request any personally identifiable information nor does it contain any forms that require a Privacy Act Statement.

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.

No private or sensitive questions will be asked.

A12. Estimates of the hour burden of the collection of information.

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

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

This is a new information collection request. With this submission, there are 19,106 respondents, 95,371 responses, and 8,868.79 burden hours. The average number of responses per respondent is 4.99. Table 2, Annual Burden Estimate, and Appendix H show 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, 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) and 611000: Elementary and Secondary Schools (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 \$1,792.83 ($\$48.02/\text{hr.} \times 37.33 \text{ hours}$). 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 \$341,763.09 ($\$47.10/\text{hr.} \times 7,256.12 \text{ hours}$). 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 \$74,198.66 ($\$47.10/\text{hour} \times 1,575.34 \text{ hours}$). Including an additional \$248,859.01 to account for fully loaded wage rates ($\$417,754.59 \times 0.33$), the estimated annualized total cost to respondents associated with this collection is \$555,613.60.

Table 2. Annual Burden Estimate

Respondent Category	Type of respondents (optional)	Instruments	Appendix	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
State Government	State Child Nutrition Directors	SFA Contact Information Request	C	56	1	56	0.5	28.0	\$48.02	\$1,344.56
		Survey Support Email	D	56	1	56	0.1667	9.3352	\$48.02	\$448.28
Local Government	SFA Directors	Pretest	G	9	1	9	0.8333	7.4997	\$47.10	\$353.24
		Survey Support Email	D	15649	1	15,649	0.0333	521.1117	\$47.10	\$24,544.36
		SFA Survey on Supply Chain Disruption	B	15649	1	15,649	0.33	5164.17	\$47.10	\$243,232.41
		Reminder Email	E	15649	2	31,298	0.0333	1042.2234	\$47.10	\$49,088.72
		Thank You Email	F	15649	1	15,649	0.0333	521.1117	\$47.10	\$24,544.36
STATE AND LOCAL GOVERNMENT SUBTOTAL				15,705	4.990	78,366	0.093	7,293.45		\$343,555.92
Private, Not-For-Profit Businesses	SFA Directors	Survey Support Email	D	3401	1	3,401	0.0333	113.2533	\$47.10	\$5,334.23
		SFA Survey on Supply Chain Disruption	B	3401	1	3,401	0.33	1122.33	\$47.10	\$52,861.74
		Reminder Email	E	3401	2	6,802	0.0333	226.5066	\$47.10	\$10,668.46
		Thank You Email	F	3401	1	3,401	0.0333	113.2533	\$47.10	\$5,334.23
PRIVATE, NOT-FOR-PROFIT BUSINESSES SUBTOTAL				3,401	5.000	17,005	0.093	1,575.34		\$74,198.66
TOTAL				19,106	4.992	95,371	0.093	8,868.79		\$417,754.59
.33% to Account for Fully Loaded Wage Rate										\$137,859.01
TOTAL REPORTING BURDEN (Fully Loaded)										\$555,613.60

A13. Estimates of other total annual cost burden.

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

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

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

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

The total annualized cost to the Federal government is \$21,023.31. This includes a total of 300 hours annually of Federal employee time—200 hours for a GS-13, Step 1 at \$49.68 per hour for a total of \$9,936 and 100 hours for a GS-14, Step 1 at \$58.71 per hour for a total of \$5,871—plus \$5,216.31 to account for fully loaded wages (\$15,807 x 0.33). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) 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).

A15. Explanation of program changes or adjustments.

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

This submission is a new information collection request as a result of program changes and will add 8,869 hours of burden to OMB's inventory.

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

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

Plans for publication have not yet been determined. The project schedule is as follows:

Collect SFA Contact Information from State agencies	Immediately following OMB approval
Collect SFA survey data	November 1 – November 30 or beginning 1 week after OMB approval
Analyze and share survey data with federal partners	December 1 – December 15 or beginning 5 weeks after OMB approval

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

FNS does not have any exceptions to the certification statement.