**Supporting Statement for OMB** **Clearance for the 2023 Farm to School Census**

**Part B**

**Revision to OMB # 0584-0646, Farm to School Census and Comprehensive Review**

February 2022

Amy Rosenthal

Social Science Research Analyst

Office of Policy Support

Food and Nutrition Service

United States Department of Agriculture

1320 Braddock Place

Alexandria, Virginia 22314

Phone: 703-305-2245

Email: Amy.Rosenthal@usda.gov

**TABLE OF CONTENTS**

[B1. Respondent Universe and Sampling Methods 1](#_Toc92968768)

[B2. Procedures for the Collection of Information 2](#_Toc92968769)

[B3. Methods to Maximize the Response Rates and to Deal with Nonresponse 3](#_Toc92968770)

[B4. Test of Procedures or Methods to be Undertaken 5](#_Toc92968771)

[B5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data 6](#_Toc92968772)

**TABLES**

[Table B.1 Summary of respondent universe and response rates 2](#_Toc92978647)

[Table B.2 Individuals consulted on statistical aspects of study design 8](#_Toc92978648)

APPENDICES

A.1 Section 18 of the Richard B. Russell National School Lunch Act

A.2 Section 305 of the 2010 Healthy Hunger Free Kids Act

B.1 2023 Farm to School Census Survey Instrument

B.2 2023 Farm to School Census Frequently Asked Questions (FAQs)

B.3 2023 Farm to School Census Preparation Worksheet

C.1 Census Recruitment Email from FNS To State Child Nutrition

Directors

C.2 Census Recruitment Announcement Email from Study Team to State Child Nutrition Directors

C.3 Census Announcement Email to SFAs

C.4 Initial Census Recruitment Email from Study Team to SFAs

C.5 Census Reminder Emails from Study Team to SFAs

C.6 Census Reminder Request Emails from Regional Lead to State Child Nutrition Directors

C.7 Census Reminder Template Email from State Child Nutrition Directors to SFAs

C.8 Census Reminder Letter from Study Team to SFAs

C.9 Census Follow-Up Telephone Script

D.1 Public Comment 1

D.2 Public Comment 2

D.3 Public Comment 3

D.4 Public Comment 4

D.5 Public Comment 5

D.6 Public Comment 6

D.7 Public Comment 7

D.8 Public Comment 8

E.1 FNS Response to Public Comment 1

E.2 FNS Response to Public Comment 2

E.3 FNS Response to Public Comment 3

E.4 FNS Response to Public Comment 4

E.5 FNS Response to Public Comment 5

E.6 FNS Response to Public Comment 6

E.7 FNS Response to Public Comment 7

E.8 FNS Response to Public Comment 8

F NASS Comments and FNS Response

G Estimated Annualized Burden

B1. Respondent Universe and Sampling Methods

**Describe (including a numerical estimate) the potential respondent universe and any** **sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The potential respondent universe for the 2023 Farm to School Census (Census) includes State, Local, and Tribal governments (directors of public school food authorities (SFAs) participating in the National School Lunch Program (NSLP), state Child Nutrition (CN) directors); businesses or other for-profit organizations (directors of private SFAs participating in the NSLP); and not for profit organizations (directors of not for profit SFAs participating in the NSLP). The Census survey will be distributed to all public and private SFAs (including residential child care institutions) participating in the NSLP in the 50 states, American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, the U.S. Virgin Islands, and Washington, D.C. State CN staff will provide contact information for the SFAs in their respective state or territory. No data will be collected from program participants.

The universe of 56 state CN directors will be asked to provide a list of public and private SFAs that administer the NSLP in their state or territory for the purpose of constructing an up-to-date Census contact list (Appendix C.1). The same staff will be asked to send two email reminders (Appendix C.6) to all SFAs in their state or territory. The expected response rate for the request to provide contact information and to send email reminders is 100 percent (see Table B.1).

For the Census survey, the potential universe is approximately 19,000 SFA directors (15,700 government, 2,300 business and 1,000 not for profit). We anticipate a 70 percent overall response rate to the survey, based on the 67 percent overall response rate observed for the 2019 Farm to School Census. For the 2023 Census we are soliciting contact lists from state CN staff earlier and continuing until after they have hired staff for that school year, which should improve the quality and accuracy of SFA director contact information given high rates of turnover from year to year. We are also streamlining the Census instrument to make it easier to complete (see Section B3 for more details).

No sampling is required for this information collection.

Table B.1 Summary of respondent universe and response rates

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Type of Respondent | Estimated Universe Size | Expected Response Rate | Target Completed Responses | 2019 Census Response Rate |
| State, Local and Tribal Government |
| State Child Nutrition directors | 56 | 100% | 56 | 100% |
| SFA directors (public schools) | 15,700 | 72% | 11,304 | 69% |
| Business |
| SFA directors (private schools) | 2,300 | 62% | 1,426 | 59% |
| Not for Profit |
| SFA directors (not for profit schools) | 1,000 | 53% | 530 | 50% |
| **Total** | **19,056** | **70%** | **13,316** | **67%** |

B2. Procedures for the Collection of Information

**Describe the procedures for the collection of information including:**

* **Statistical methodology for stratification and sample selection;**
* **Estimation procedure;**
* **Degree of accuracy needed for the purpose described in the justification;**
* **Unusual problems requiring specialized sampling procedures; and**
* **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

Information to build the contact list for SFA directors will be collected from the relevant state CN agency. All CN directors will be asked to provide contact information in order to create an accurate contact list, so there will be no sampling of state CN agencies. The Food and Nutrition Service (FNS) National Office will liaise with Office of Community Food Systems (OCFS) Regional Leads to alert the relevant agencies (Appendix C.1), and the study team will provide telephone and email support to CN directors as requested. Based on previous experience, we expect that directors will primarily provide the data in Excel files, but we will be prepared to work with directors should it be more convenient for them to provide the data in a different format.

The Census survey will be sent to all SFAs participating in the NSLP in any state or territory, so there will be no sampling of SFAs. SFAs will receive an email with a unique link to participate. They will also have the option to use a toll-free telephone number to complete the survey over the phone, but based on administration of the 2019 Census, we anticipate that almost all will respond via the web survey. SFAs will receive up to ten reminder emails as well as a phone call and mailing to encourage their completion of the survey (Appendices C.7-C.9). As such, no specialized sampling procedures are planned.

The Farm-to-School Census is a periodic data collection. The 2023 Census will be the fourth collection in ten years (previous iterations were administered in 2013, 2015 and 2019).

B3. Methods to Maximize the Response Rates and to Deal with Nonresponse

**Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

The request for contact information is expected to achieve a 100 percent response rate, and the Census survey is expected to receive a 70 percent response rate. The approach to achieving high response rates builds on prior FNS study experience. The ultimate response rate depends on successfully contacting those sampled, securing their participation in the study, and offering support and completion reminders, all of which have been carefully addressed in the study plan.

CN agencies will receive an introductory email from the FNS National Office to introduce the 2023 Census and outline what is requested of them, notably, providing contact information for all SFA directors in their state or territory (Appendix C.1). For the 2023 Census, FNS will ask CN agencies to finalize this information after they have finished hiring SFA directors for the 2023-2024 school year. Given the high rates of year-to-year turnover in SFA directors, this will maximize the likelihood of having the correct contact information and ensure delivery of the survey to the appropriate SFA representative. The study team may copy OCFS Regional Leads on communications with the CN directors to promote participation and response.

For communication with SFAs, we will distribute engaging recruitment materials with standardized language to describe the study and encourage participation. (Appendices C.3-C.5, C.7-C.8) . The emails announcing the Census and inviting the SFA to participate will emphasize the importance of this study as well as offer information so that SFAs understand what is being asked of them (Appendix C.3-C.4). Contact information will be used for initial correspondence and will be updated as needed throughout the data collection period to facilitate communication with the respondents. (Respondents will be asked to email the study team in order to update contact information.)

To encourage participation and discourage unit nonresponse, the study team will include in each email a frequently asked questions document to answer common SFA questions that may lead to nonresponse if unanswered (Appendix B.2). SFAs can also ask questions via the study email or phone number. Staff will be readily available to clarify survey questions and work with participants to resolve technical issues.

The introductory material of the survey (Appendix B.1) as well as the outreach emails sent to SFA directors (Appendices C.3-C.5 and Appendix C.7) will include a link to a worksheet (Appendix B.3) to make SFA directors aware of key questions that will be asked of them on the survey. This will help ensure that the respondent can gather necessary information before beginning the survey and/or request assistance from a colleague who might have the appropriate knowledge. We also will highlight in the survey introductory material (Appendix B.1), the frequently asked questions (Appendix B.2), and email communications (Appendices C.3-C.5) that several individuals can access the survey via the emailed link, so that the appropriate person can respond to each question. The web survey will allow respondents to save and exit the survey at any point, and then return to access and complete the survey later. SFAs will also have the option to complete the survey over the phone should they prefer.

Using data from the 2019 Census, we have streamlined and purposively arrange the 2023 survey questions to enhance the respondent experience and discourage item nonresponse. As in 2019, a survey may be considered complete for the purposes of analysis if the SFA provides responses to a minimum number of key questions.

SFA directors, including those who have begun but not completed a survey, will receive email follow-up reminders approximately every ten days (Appendices C.5 and C.7),. Up to two follow-up telephone calls will be made to sampled units who have not completed the survey by the end of November (Appendix C.9). SFAs that have not opened the survey will also receive a mailing to the SFA address (Appendix C.8).

B4. Test of Procedures or Methods to be Undertaken

**Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information**.

Pre-testing is not necessary for collecting SFA contact information from State CN directors.

The 2023 Census survey is based on the instrument used in the 2019 Census, which was cognitively pre-tested as described in the currently approved Information Collection (OMB No. 0584-0646, expiration date March 31, 2022).

In comparison to the 2019 survey instrument, seventeen questions have been removed (notably those related to how SFAs track information and the sources they used to respond to the survey). Some questions and response options have been slightly reworded, and others have been combined to streamline the instrument. Twelve new questions as well as some additional response options were added to collect more detail about current issues in farm to school, including challenges and technical assistance needs, characteristics of local items purchased, and effects of the COVID-19 pandemic on procurement. All changes have been designed to ensure comparability between the 2023 and 2019 Census.

An advisory panel of external stakeholders also reviewed the instrument (see Table A.1 in Supporting Statement Part A). The advisory panel was recruited based on participation in the 2019 Farm to School Census and Comprehensive Review advisory panel and content area knowledge of farm to school. Based on feedback from these reviewers, we added questions related to the COVID-19 pandemic, added additional skip logic to reduce burden on respondents, and adjusted the language of some questions and response options for clarity.

To confirm these minor changes, we plan to conduct a pretest with no more than 9 SFA directors in early calendar year 2023. Delaying the pretest will allow pretest respondents to focus on navigating supply chain challenges and operating school food service during the COVID-19 pandemic. We will also avoid the busy “back to school” season for SFAs (i.e., September through November).

For pre-testing, a sample of up to nine directors from SFAs that vary in food service operations, urbanicity, and size will be recruited. The directors will review an electronic or hard copy version of the full survey instrument and provide feedback during a telephone interview. We will ask specifically about the overall burden and the revised content. The pretest will focus on new or changed content and is expected to result in only minor changes to question wording and response options. A non-substantive change request memorandum will be submitted to OMB if more significant changes are required. We will update the survey instrument (Appendix B.1) as well as associated materials (i.e., the worksheet (Appendix B.3)) according to their feedback.

B5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

**Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Table B.2 lists individuals consulted on statistical aspects of the design. The study team is led by Amy Rosenthal (FNS Project Officer). Other staff who will collect and/or analyze the data will depend on the contractor who wins the award to administer the 2023 Census.

Table B.2 Individuals consulted on statistical aspects of study design

| **Reviewer** | **Affiliation** | **Phone** | **Email** |
| --- | --- | --- | --- |
| Conor McGovern | FNS/USDA | 703-457-7740 | conor.mcgovern@usda.gov |
| Amy Rosenthal | FNS/USDA | 703-305-2245 | amy.rosenthal@usda.gov |
| Courtney Paolicelli | FNS/USDA | 571-302-6447 | courtney.paolicelli2@usda.gov |
| Mingshan Zheng | NASS/USDA | 202-720-0830 | mingshan.zheng@nass.usda.gov |