

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

**Part A**

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

February 2022

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## **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 intended purpose of this information collection is to administer the 2023 Farm to School Census (Census). This information collection request is for a revision and extension for three years to the currently approved Farm to School Census and Comprehensive Review (OMB Number 0584-0646, expiration date 3/31/2022).

Section 18 of the Richard B. Russell National School Lunch Act (NSLA) authorized and funded the U.S. Department of Agriculture (USDA) to establish a farm to school program to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve food and agriculture education as well as access to local foods in schools (Appendix A.1). This work is housed within the Food and Nutrition Service (FNS) Office of Community Food Systems (OCFS). As part of the Farm to School Program’s authorization, OCFS collects and disseminates information on farm to school activities throughout the country.

OCFS conducted a nationwide Farm to School Census in 2013 (OMB Control No. 0536-0069, led by the USDA Economic Research Service), 2015 (OMB Control No. 0584-0593), and 2019 (OMB Control No. 0584-0646). The Census provides the only nationally representative data available on farm to school participation and activities in the United States. It also compiles detailed information about state- and school food authority (SFA)-level farm to school engagement. The 2023 Census will collect and synthesize data from a national census of SFAs to fulfill the following study objectives:

- 1) establish the scope of SFA participation in farm to school activities and the characteristics of participating SFAs;

- 2) describe details of SFA participation in certain farm to school activities (especially procurement of local foods);
- 3) assess sources of support for farm to school activities and identify areas for additional assistance; and
- 4) compare findings across different types of SFAs (i.e., based on characteristics such as size, urbanicity, and eligibility for free and reduced-price meals) and to findings from the 2019 Census.

## **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.**

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

The results of this study will be used to assess farm to school program engagement and to set priorities for USDA outreach and technical support, as mandated by the NSLA. This fourth iteration of the Census will also allow FNS to make comparisons of farm to school activities and trends nationally across time. OCFS regional staff will share the data with State agencies to inform State and local priorities and activities.

OCFS has used Census data to direct training, technical assistance, and outreach efforts in the areas of local food procurement and school gardens. For example, OCFS used data from the 2013 and 2015 Censuses to enhance local procurement trainings to target underutilized products, incorporate garden-grown produce, and address barriers reported by SFAs. Additionally, OCFS has been able to identify low-performing states and provide direct customer service to those who were interested in expanding farm to school efforts.

Once the Census data have been analyzed, FNS will publish a report to share the findings. As with each previous iteration of the Census, OCFS will create a dedicated website with national-, State- and SFA-level Census results so that these can be disseminated to and used by States, SFAs, and other stakeholders in the general public. (See the 2019 Farm to School Census findings at <https://farmtoschoolcensus.fns.usda.gov/>.)

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

Information will be collected from State, Local, and Tribal governments (directors of public SFAs participating in the NSLP and state Child Nutrition (CN) staff); 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 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 Child Nutrition staff will provide contact information for the SFAs in their respective state or territory.

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

Information will be collected using an online survey that will take 5 to 30 minutes to complete (Appendix B.1). (SFAs that do not participate in farm to school activities will receive only a few questions while SFAs that engage in farm to school will receive the full survey.) SFAs will also have the option to complete the survey over the phone should they desire. Recruitment and follow-up to enhance response rates will use multiple methods (i.e., phone, mail, and email) (Appendices C.1-C.9).

The 2023 Census survey instrument is based on previously cleared survey instruments used in 2013, 2015, and 2019. The Census questionnaire asks all SFAs whether they have participated in or plan to participate in any of 30 farm to school activities. An SFA that participated in any of the defined activities in school year (SY) 2022-23 will receive further questions about: other school meals programs offered, the SFA's definition of "local," perceived benefits and challenges of farm to school activities, the SFA's food procurement and service approach, food purchases and costs, staffing and funding for farm to school activities, and policies related to farm to school. SFAs that did not participate in any of the defined activities will receive a limited set of questions about

school meal programs offered, why the SFA does not participate in farm to school, and whether and when the SFA plans to conduct farm to school activities in the future.

State CN staff will be asked to provide contact information for the SFAs in their state or territory. Data collected for the contact list will include SFA contact name, title, telephone number, email address, and mailing address. For the contact list, state CN staff will be contacted via email and asked to provide data files via email.

This is a mandatory collection. Section 305 of the NSLA mandates programs under its authorization to cooperate with USDA program research and evaluation activities (Appendix A.2). The participants will be notified of this language requiring their cooperation in studies of CN programs. However, participation or non-participation in this information collection will not affect an SFA's eligibility for program benefits or other funding.

### **Frequency of data collection**

The Census will be administered once in SY 2023-2024. Data collection will span approximately three months, from October through December. The contact list will be developed in summer of 2023 and finalized in September 2023.

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

Results will be presented in aggregated form in final reports made available in the research section of the USDA Food and Nutrition Service web site (<http://www.fns.usda.gov/ops/research-and-analysis>). Consistent with previous Census data, SFA, state and national data will also be made publicly available.

## **Changes in this revision**

FNS is requesting a three-year extension to the approved collection through 03/31/2025 and an accompanying upward revision in burden hours to support the 2023 administration of the Farm to School Census.

This revision makes changes to the information collection and burden table as originally approved through 3/31/2022. The major change is the request for an addition year of burden to accommodate administration of the 2023 Census. No further distributor interviews will be conducted under this information collection. We have also changed the title of the information collection to “2023 Farm to School Census” (from “Farm to School Census and Comprehensive Review”).

In addition, some changes have been made to the survey instrument. These changes are mostly for purposes of clarity and to respond to current research needs. They are based on revised research questions developed for this Census administration, feedback from the previous iteration of the study, and comments from individuals consulted outside FNS (see Section A8 below). 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.

For the Census collection, the type of information to be collected, the methods of collection, and the frequency of collection will largely remain the same, with a few revisions. We have



removed a thank you email and a request to state agriculture departments to send a reminder email, and we revised the anticipated response rate to the reminder emails and the Census overall. We also revised the estimated time per response to email reminders to be the same for responsive and non-responsive responses (1 minute or .0167 hours). Minor updates to sample sizes reflect the addition of the Northern Mariana Islands and the most recent estimates of the number of SFAs. We have also corrected an error in the estimated number of small entities this collection will affect (from approximately 1% to 71%).

To accommodate the 2023 Census, we are requesting an addition of 18,690 total burden hours and 272,016 responses.

### **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, 2002 to promote the use of technology. Online surveys enable efficient, secure survey participation. Surveys can be started and returned when convenient for the respondents. Also, programming checks ensure respondents see only relevant questions and constrain data ranges, keeping responses within a certain length and simplifying data cleaning.

SFAs will be notified in advance of the survey by state agency staff and provided with a list of frequently asked questions (Appendix B.2) and a worksheet (Appendix B.3) to help them prepare to complete the survey. Respondents will be able to complete surveys over the phone if that is preferable, and support will be available by telephone and email.

These procedures are designed to minimize the burden on respondents. Based on the 2019 Census, FNS estimates that 99% of survey responses (approximately 13,127 responses) will be collected electronically. The remaining 1% will be collected by telephone. All of the responses to the request to State CN staff for SFA contact information (56 responses) 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.**

Every effort has been made to avoid duplication. The data requirements for the study have been carefully reviewed, and no similar data collection is available. The information required for this study is not currently reported to FNS on a regular basis in a standardized form, nor is the information available from any other previous or contemporary study. This study represents the only source of national data about farm to school activities in the United States.

#### **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.**

FNS estimates approximately 13,250 respondents (approximately 71.1%) will be “small entities” as defined by OMB Form 83-I. (This is a correction from an estimated 1% on the existing clearance.) Although there are small SFAs in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Collecting the requested information will not have a significant economic impact on these small entities.

Information being requested has been held to the minimum required for the intended use. We plan to minimize respondent burden by:

- keeping the survey instrument short (5 to 30 minutes to complete);
- providing advance notification of the survey and the information it will request of respondents;

- employing a user-friendly, mobile-friendly web interface and giving respondents the option to complete surveys over the phone;
- and providing technical support in various modalities (i.e., email and phone).

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

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

The data collection for the proposed study will be conducted one time only during SY 2023-24, and these data are only collected every four years. These data are essential to track farm to school efforts nationwide. Without this information, FNS will not be able to fully assess participation in farm to school activities and the associated challenges and benefits. Specifically, in an effort to measure progress towards increasing the availability of local foods in schools, OCFS conducted a nationwide Farm to School Census in 2013, 2015 and 2019. The 2023 Census instrument is based on these previous iterations of the Census, allowing the study team to look at trends over time and consider longer-term implications of the findings. Data collected from the 2023 Census will provide needed information on farm to school programming (e.g., gardens, food education) and local foods purchases (e.g., sourcing, spending, variety of items) and will help FNS to address challenges with the program and inform FNS farm to school technical assistance activities provided to states.

## **A7. Special Circumstances Relating to the Guidelines 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.**

### **Federal Register notice**

A notice of this study was published in the *Federal Register* on December 2, 2021, Volume 86, Number 229, pages 68460-68464. The public comment period ended on January 31, 2022, and FNS received eight comments. FNS determined that three comments were not germane to the information collection as they did not relate to the necessity or the practical utility of the information collection nor did they address burden elements such as the cost, the time estimate for completing the collection, the frequency of the collection, or the method of the collection. Comments and FNS responses are provided in Appendices D.1-D.8 and E.1-E.8, respectively, and relevant comments are summarized below.

- FNS should use an app or web portal to collect data instead of email or telephone.

The 2023 Census will be available online, and we anticipate 99% of respondents will use this method to respond. In addition, we plan to make the online survey mobile-friendly so that respondents can easily access and complete the survey. As in 2019, we will distribute the Census survey to school food authorities by email, as this is the most direct method by which to contact potential respondents.

- FNS should collect data related to the amount of spending by SFAs on local foods and the items SFAs are purchasing locally.

Past iterations of the Farm to School Census have collected this information; in 2019, school food authorities provided estimates of their spending on all foods, local foods, and local fluid milk (not including entitlement spending). They also provided estimates of their spending on all foods and all local foods through the USDA Department of Defense (DoD) Fresh program. The 2019 Census also asked for the top five local items that SFAs spent the most on in SY 2018-19. We will continue to collect similar data for SY 2022-23 in the 2023 Farm to School Census.

- Multiple respondents should be allowed and encouraged to provide answers to survey questions. The survey will be shareable using the SFA's unique link, and anyone with the link will be able to open the survey, respond to questions, and save their answers. Where possible, FNS will work with the survey programmer to make collaboration on the survey as intuitive and convenient as possible, for example, by offering an option to share links to specific questions. Communications with SFA directors will highlight these features and encourage directors to reach out to other staff for information as needed.
- Census questions should be in plain language and at a middle school reading level to make them easy for SFA directors to understand.

We have edited the language of several survey questions and streamlined the instrument (while maintaining comparability to the 2019 questionnaire) in order to make the survey easier for respondents to understand and complete. We also will offer phone and email support to help respondents with any questions or issues.

- Respondents should be made aware of the relevance of the survey and how the data collection will benefit them.

Communications to respondents will highlight why it is important for them to complete the survey.

- Using an electronic survey administration tool would allow for immediate use of the data collected.

We will collect responses to the 2023 Census electronically. However, we require sufficient time to process and analyze the data as well as obtain clearance before we can publicly share the findings.

- Data should be collected for the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP).

As in 2019, the 2023 Census will ask about service of local foods in several Child Nutrition programs operated by SFAs, including the School Breakfast Program, CACFP, CACFP At-Risk Afterschool, NSLP After School Snack Service, and the summer meal programs (SFSP and Seamless Summer Option). However, the Census is not distributed to CACFP or SFSP sponsors that are not SFAs, so we cannot collect information from this population.

### **Efforts to consult with persons outside the agency**

The 60-day notice published in the Federal Register allows the public and stakeholders an opportunity to comment on this collection. FNS consulted with Mingshahn Zen from National Agricultural Statistics Service (NASS) on the study design and methodology. NASS comments and the response to NASS comments appear in Appendix F. On Friday, December 10, 2021, OCFS held a listening session with representatives from state Child Nutrition agencies to request

feedback on proposed plans for information collection and recruitment of SFAs. Feedback on the survey instrument was also solicited from the individuals listed in Table A.1. 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.

**Table A.1 Individuals Providing Feedback on Survey Instrument**

<b>Name</b>	<b>Title</b>	<b>Affiliation</b>	<b>Phone Number</b>
Mingshan Zheng	Mathematical Statistician	National Agricultural Statistics Service	202-720-0830
Ashley Chaifetz	Agricultural Marketing Specialist	Agricultural Marketing Service	470-614-9413
Lydia Oberholtzer	Senior Research Assistant	Penn State University	
Colleen Matts	Farm to Institution Specialist	Michigan State University	517-432-0310
Sandy Curwood	Director	Virginia Department of Education, Office of School Nutrition Programs	804-225-2074
Becca Jablonski	Assistant Professor and Food Systems Extension Economist	Colorado State University	970-491-6133
Saied Toosi	Agricultural Research Economist	Economic Research Service	
Margaret Read	Senior Manager	No Kid Hungry Campaign, Share Our Strength	475-209-2122

## **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.**

FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19078-19080, that discusses the terms of protections that will be provided to respondents. FNS and the contractors will comply with the requirements of the Privacy Act of 1974. No confidential information is associated with this collection of information, and no such assurances of confidentiality are provided. The contractor hired to administer the survey will handle IRB clearance.

No personally identifiable information (PII) is requested directly from survey respondents. All personal contact information gathered from state CN staff will be for research purposes only and kept private to the full extent allowed by law. When invited to participate in a survey, respondents will be assured that their personal information (i.e., name, phone number, and email) will remain private. Responses will be grouped with those of other study participants, and no individual respondents will be identified in any study report. Being part of this study will not affect any USDA benefits received by the participating programs. Consent language will be included in the introduction to the Census instrument.

Only those designated on the contractor study team as well as FNS research staff will have access to files containing respondent contact information. The Census will use a secure software administration platform to collect survey responses. HTTPS will be enforced for transmission of all credentials as well as for all connections for the study team associates at the user level. The SQL server databases that store respondent and response data will only be accessed by named users.



All electronic data will be transferred using a secure portal website and will be stored on secure drives with access restricted to staff associated with the project. The study team will destroy all data at the end of the contract.

The study team will prepare a restricted-use version of the data for internal FNS use and a public-use version for the broader research community. The public use files will remove (or mask, when removal is not possible) all personally identifiable information and be ready for copying and dissemination to the public.

The Census instrument does not require a Privacy Act Statement. Michael Bjorkman, USDA FNS Privacy Officer, reviewed this submission and indicated on January 21, 2022 that he had no privacy-related 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. Michael Bjorkman, USDA FNS Privacy Officer, reviewed this submission and indicated on January 21, 2022 that he had no privacy-related concerns.

### **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 and extension of a currently approved collection. With this submission, there are 19,065 respondents (13,325 responsive and 5,740 non-responsive), 272,016 responses (100,716 responsive and 171,300 non-responsive), and approximately 18,690 burden hours (15,079 responsive and 3,611 non-responsive). The average number of responses per respondent is 14.27. The Estimated Annualized Burden (Appendix G) shows the estimates of the annual respondent burden for the proposed data collection, including the number of annual respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect administrative data, findings from the 2019 Census and experience administering the 2019 Census.

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

Table A.2 provides estimates of the annual costs to each of type of respondent. The total costs are \$575,910.

**Table A.2 Annualized Cost to Respondents**

Respondent Type	Total Annual Burden Hours	Hourly Wage	Respondent Cost
State government	88	\$42.92	\$3,765.84
Local government	15,529	\$30.56	\$474,581.07
Business	2112	\$31.75	\$67,065.77
Not for Profit	961	\$31.75	\$30,497.32
<b>Total</b>	<b>18,690</b>		<b>\$575,910*</b>

\* Total differs slightly from Total Annual Cost Burden in Appendix G due to rounding.

The estimate of annualized cost to State and local government agencies is based on the burden estimates and mean hourly wage data for the NAICS Code 999200 State Government, Occupational Group 11-9000 (Other Management Positions) for CN directors and Occupational Group 11-9051 (Food Service Managers) for SFA directors. The hourly mean wage for 11-9000 is \$42.92 per staff hour, and

the hourly mean wage 11-9051 is \$30.56 per staff hour (U.S. Department of Labor, Bureau of Labor Statistics, May 2020 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 999200 – State Government, excluding schools and hospitals, [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm)).

The estimate of annualized cost to businesses and not for profits is based on the burden estimates and mean hourly wage data for the May 2020 National Occupational and Wage Statistics, NAICS Code 722300 Special Food Services, Occupational Group 11-9051 (Food Service Managers). The hourly mean wage is \$31.75 per staff hour (U.S. Department of Labor, Bureau of Labor Statistics, May 2019 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 722300 - Special Food Services, [https://www.bls.gov/oes/current/naics4\\_722300.htm#11-0000](https://www.bls.gov/oes/current/naics4_722300.htm#11-0000)).

Including an additional \$190,050.30 to account for a fully loaded wage rate (\$575,910 x 0.33), the estimated annualized total cost to respondents associated with this collection is \$765,960.30. (These totals differ slightly from those presented in Appendix G due to rounding.)

### **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.**

We estimate that Federal employees at the GS-13 level will spend on average approximately 300 hours per year overseeing the surveys and that Federal employees at the GS-14 level will spend approximately 20 hours per year overseeing the surveys. Most of these hours will be spent by employees in the National Office, with some spent by staff in Regional Offices. Using the Washington, DC-area 2022 wage rates of \$51.18 per hour for a GS-13, Step 1 employee and \$70.57 per hour for a GS-14, Step 6 employee (Office of Personnel Management, Salary table 2022-GS, [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf)), we estimate \$16,765.40 (\$15,354 for the GS-13 employees and \$1,411.40 for the GS-14 employees) in wages. Adding in \$5,532.58 to account for fully loaded wages ( $\$16,765.40 \times 0.33$ ), total Federal employee costs per year are estimated at \$22,297.98.

## **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 request for a revision and extension of the currently approved collection for OMB Number 0584-0646, Farm to School Census and Comprehensive Review, renamed to 2023 Farm to School Census. This information collection is currently approved with 25,061 burden hours and 227,965 responses, which was used for the 2019 Census and distributor interviews. To accommodate administration of the 2023 Census, we are requesting 18,690 total burden hours and 272,016 responses. This represents 6,371 fewer burden hours and 44,051 more responses more than the initially approved request. The removal of the distributor interviews, a thank you email, and a request to departments of agriculture to send a reminder email are program changes contribute to a decrease in burden hours by 544 hours. Adjustments to the respondent sample sizes and anticipated response rates contribute to a decrease in burden hours by 5,827 hours. The

number of responses is more than in the initially approved request due to the adjustment in anticipated response rates; we expect lower response rates to initial reminder emails and thus will send more reminder emails.

#### **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.**

All contact information will be compiled in aggregated form in electronic spreadsheets. This information may be shared with relevant FNS employees and contractors who are involved in other studies involving the same respondents to reduce the burden of duplicate information collections. This information will not be shared with the general public.

Data file preparations and analysis of the data will begin immediately after the data collection period (January 2024). The study team will use standard quantitative methods to analyze data from the Census survey. Analyses will be conducted using a statistical software package, such as SAS or Stata. Principal analysis methods will be descriptive, including simple tabulations, as well as cross-tabulations by subgroup where appropriate. For relevant questions, we will perform basic statistical hypothesis testing (e.g., testing for differences across subgroups of SFAs). If the national response rate is less than 80%, a non-response bias analysis will be conducted and appropriate weights added to the data.

The contractor administering the survey will formally present study findings to FNS at an internal briefing. Following this briefing, the contractor will submit a final report to FNS, which will then be prepared for publication and public dissemination. Results for each respondent SFA as well as tabulations and estimations for national and state-level statistics will be made available on a custom-built website. (See the 2019 Farm to School Census findings at

[https://farmtoschoolcensus.fns.usda.gov/.](https://farmtoschoolcensus.fns.usda.gov/)) FNS will also prepare materials (e.g., template presentations) for use in sharing Census results with regional and state offices.

### **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 83-1 “Certification for Paperwork Reduction Act.”**

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-

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