

April 2022

TO: Jordan Cohen, OMB Desk Officer

Office of Information and Regulatory Affairs

Office of Management and Budget (OMB)

THROUGH: Jamia Franklin, FNS Information Collection Officer

Planning and Regulatory Affairs

Food and Nutrition Service (FNS)

Ruth Brown, OCIO Desk Officer

Information Management Division

Office of the Chief Information Officer (OCIO)

FROM: Constance Newman, Senior Analyst

Special Nutrition Research and Evaluation Division

Office of Policy Support

Food and Nutrition Service (FNS)

SUBJECT: Justification for Non-Substantive Change to OMB Control No: 0584-0669 Study of Nutrition and Activity in Child Care Settings II (SNACS-II) to revise language in the recruiting materials. No changes to protocols or burden.

FNS is requesting a non-substantive change to the previously approved collection, Study of Nutrition and Activity in Child Care Settings II (SNACS-II), (OMB Control No. 0584-0669, exp. 10/31/2024).

SNACS-II will provide FNS with a comprehensive assessment of the Child and Adult Care Feeding Program (CACFP) and provides a needed update to the first study, SNACS, on which SNACS-II is modeled. The assessment will examine topics such as the nutritional quality of meals and snacks provided in CACFP as well as many other aspects such as program costs and characteristics of the providers that participate in the program.

FNS would like to revise a specific sentence that recurs throughout the SNACS-II recruiting materials. Here is the existing version and the proposed version:

* The relevant sentence in the recruiting material in the attached files currently reads as follows:

“While participation in this study is voluntary, [providers/sponsors] are strongly encouraged to participate per Section 28 of the National School Lunch Act.”

* FNS would like to revise that sentence to read:

“Under the terms of Section 28 of the Richard B. Russell National School Lunch Act, institutions participating in CACFP are required to participate in this data collection.”

The language in the School Lunch Act referenced above states:

“(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.”

OMB approved similar “mandatory” language for the School Meals Operations (SMO) Study, OMB Control # 0584-0607. OMB approved the following language for the SMO study: “Under the terms of the FFCRA waivers and Section 28 of the Richard B. Russell National School Lunch Act, sampled SFAs and the 67 SAs that administer the Federal CN programs in the 50 States, District of Columbia, Puerto Rico, Guam, and the U.S. Virgin Islands are required to participate in this collection.”

The attached documents identify each of the specific locations in the SNACS-II materials where the requested changes would be made.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.

Attachments:

C5\_Study FAQs

C6\_Study FAQs – Spanish

C7\_USDA Endorsement Letter

C8\_USDA Endorsement Letter – Spanish

C11\_Sponsor Recruitment Letter

C13\_Sponsor Recruitment Call Script

C15\_Endorsement Email to Encourage Provider Participation

C16\_Endorsement Email to Encourage Provider Participation – Spanish

C19\_Provider Recruitment Letter

C20\_Provider Recruitment Letter – Spanish

C23\_Provider Recruitment Script

C24\_Provider Recruitment Script – Spanish

C29\_Provider Enrollment Confirmation Email

C30\_Provider Enrollment Confirmation Email – Spanish

D1\_Recruitment Website

D2\_Recruitment Website –Spanish

E1\_Pre-Visit Cost Telephone Interview

E2\_Pre-Visit Cost Form

E4\_Sponsor-Center Cost Interview

E5\_Center Director Cost Interview

E6\_Center Food Cost Interview

F7\_Provider Survey

F8\_Provider Survey – Spanish