



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
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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