

**Generic Clearance to Conduct Formative Research or Development of Nutrition
Education and Promotion Materials and Related Tools and Grants for FNS
Population Groups**

**OMB CLEARANCE PACKAGE
0584-0524**

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Consumer Research for Nutrition Education and Promotion Activities

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Team Nutrition Educational Technology Environmental Scan

- A Consent Package for School Focus Groups
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- D Moderators Guide for Teacher Focus Groups
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- F Flyer for School Focus Groups
- G Introduction Email for School Focus Groups
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- I Principal Letter of Agreement
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Improving School Meal Program Accuracy through Pre-ordering and Grab and Go Systems

- A State Recruitment Letter
- B SFA Recruitment Letter
- C School Recruitment Letters
- D.1 SFA/School Follow-up Script
- D.2 State Follow-up Script
- E.1 Pre-ordering App Examples - Paper
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- F Research Protocol
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Mealtimes with Toddlers in the Child and Adult Care Food Program

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- B: Mailing flyer for child care site providers
- C: Initial call script for child care site directors and providers
- D: Initial email for child care site directors
- E: Email instructions for child care site directors and providers
- F: Follow up call to screened research participants
- G: Scheduling confirmation email for research participant
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- I: Scheduling reminder email for research participant
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P: IRB Exempt Letter

Q: English Handouts

R: Spanish Handouts

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- U1.a: English Audition - Alexis Smith
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- U1.d: English Audition - Karyn-Siobhan Robinson
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- U2.a: Spanish Audition - Dominique Ravelo-Napoli
- U2.b: Spanish Audition - Sussy Tomer
- U2.c: Spanish Audition - Tanairi Zarazua
- U3.a: English and Spanish Audition - Alina Collins
Maldonado
- U3.b: English and Spanish Audition - Arami McCloske
- U3.c: English and Spanish Audition - Nina-Sophia
Pacheco

V: Key Frames

**Collection of Produce Safety University Course Feedback and Program
Impact Data**

- A PSU Welcome Questions
- B PSU Course Evaluation
- C PSU Six-month Follow-up Program Impact Evaluation

Term of Clearance: Food and Nutrition Service (FNS) will continue to adhere to the terms of clearance for this Generic Clearance.

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

- 1. 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.**

This is a revision of a currently approved data collection. This information collection is based on Section 19 of the Child Nutrition Act of 1966 (42 U.S.C. 1787) Section 5 of the Richard B. Russell National School Lunch Act (42 U.S.C. 1754) and Section 11(f) of the Food and Nutrition Act of 2008 (7U.S.C.2020). This request for approval of information collection is necessary to obtain input into the development of nutrition education resources and interventions for population groups served by the U.S. Department of Agriculture, Food and Nutrition Service (USDA-FNS). FNS will also use this information collection to obtain data that will be used to determine the scope and direction of various types of grants.

Diet has a significant impact on the health of citizens. Diet quality is linked to four leading causes of disease, which can reduce the quality of life and cause premature death. While diet-related problems, including obesity affect all Americans, they have a

greater impact on the disadvantaged populations served by many FNS programs and grants. One of FNS' goals includes improving the nutrition of children and low-income families by providing access to program benefits and nutrition education. The FNS programs include Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamp Program (FSP), Child Nutrition, Food Distribution, and the Supplemental Foods Program for Women, Infants and Children (WIC).

The basis of our approach rests on the philosophies that all health communications and social marketing activities must be science-based, theoretically grounded, audience-driven, and results-oriented. Secondly, consumer-based health communications require a focus on specific target audiences, encourage positive behaviors in culturally relevant ways, identify unique benefits and supports for adopting the new behavior, provide insights into the most appropriate time, and inspire consumers to take action to the message. Interventions need to be designed so that these messages can be delivered through different types of media and in a variety of formats for diverse audiences.

FNS develops a variety of resources to support nutrition education and promotion activities. These resources are designed to convey science-based, behavior-focused messages about healthy eating and physical activity to children and adults eligible to participate in FNS nutrition assistance programs and to motivate them to adopt healthful eating behaviors as defined by the Dietary Guidelines for Americans (DGAs). This includes education and program materials, messages, promotion tools and interventions for the diverse population served by the federal nutrition programs

including WIC, SNAP Child Nutrition, Food Distribution and other programs. Grants can also be used to support these programs.

The following list includes formative research activities that have previously been authorized under the generic collection. Similar types of activities are anticipated over the period of clearance:

- Consumer Research for Nutrition Education and Promotion Activities
- Core Nutrition Messages
- School Wellness Communication Tools Testing
- Team Nutrition Curriculum
- Team Nutrition Testing for Elementary and Middle School
- Food Distribution Food Quality and Messaging surveys
- Applications or Nominations for nutrition education and wellness award programs promoting best practices

This information collection also includes two activities, Improving School Meal Program Accuracy through Pre-ordering and Grab and Go Systems and Mealtimes with Toddlers in the Child and Adult Care Food Program, that were approved by OMB in July and September of 2019. These are still ongoing activities that are being included to keep the approval for them current while FNS wraps up these activities. In addition, this information collection includes a generic IC submission for the Collection of Produce Safety University Course Feedback and Program Impact Data that FNS could not submit for approval before the expiration of the collection because there would not be enough time to get this submission reviewed and approved before the approval expired. Therefore, FNS is submitting the generic IC submission for the Collection of Produce Safety University Course Feedback and Program Impact Data for review and approval as part of this renewal package.

Future activities will support a variety of program projects and ongoing interventions, social marketing initiatives, outreach and awareness efforts - such as nutrition education and promotion activities, food safety education and activities necessary to meet emerging needs, update current resources, and support new program and/or national policy initiatives. The future activities under this generic will also support the development of various grants by suggesting different scopes and directions for the grants.

Formative research methods and information collection will include multiple approaches such as focus groups, interviews (dyad, triad, telephone) field-testing, curriculum, surveys and web-based information gathering tools. In accordance with OMB guidance regarding this generic clearance, we will provide individual memos explaining the exact methods of information collection as well as copies of the tools or instruments for gathering the data with each clearance package.

Federal legislation in 2004 and 2010 amended the Richard B. Russell National School Lunch Act to require that state agencies conduct additional reviews of selected School Food Authorities (SFAs); to provide annual funding for states to be used for oversight and training of SFAs, with a focus on SFAs that demonstrated a high level of, or a high risk for, administrative error; and required the implementation of a more robust and unified accountability system.

This request is to acquire clearance to conduct formative research with grant recipients to assist FNS with identifying effective design and implementation approaches for future grants. This research will identify grantees' experiences, expectations, challenges and lessons learned in order to inform the development and success of future grant funding activities.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collected by FNS or its contractors provides formative input and feedback on how best to reach and motivate the FNS target population. There are a few forms associated with customer feedback, request, agreement and or visitation to FNS Headquarters. These ongoing data collection tools are identified in the table of content and will be submitted as appendices as part of this approval. In addition, the table of contents identifies two approved submissions that FNS is currently conducting and one new generic IC submissions that are being submitted as appendices to this renewal as well. The data obtained provides insights regarding the content and potential use of materials and products. Insights regarding implementation approaches and delivery methods help to identify approaches that are more effective in reaching, engaging and motivating the target audiences to act considering their resource constraints. The information collected allows the agency to make appropriate adjustments in content and the methods used in the developmental and testing stages in order to improve the final products. The information collected may also be used to improve upon the scope and direction of future grants.

Under this generic clearance, the agency will collect information from a variety of program participants and potentially eligible persons, State and local program partners and service providers, and others that play a direct role and/or influence factors that mediate conditions that affect decision of the audiences FNS programs serve. In order to determine future nutrition education and outreach needs, tools and dissemination strategies, key informant interviews will be conducted. This task involves collecting a diverse array of information from a variety of groups including perspectives from people familiar with: the target audiences; the objectives of nutrition education and outreach interventions and projects; program constraints at State and local levels; and related issues. Expert opinions from program constituencies, researchers, and practitioners will be collected through focus groups, interviews, surveys and/or other methods. FNS will also collect information regarding effective nutrition education and outreach initiatives implemented by State agencies that administer nutrition assistance programs to promote repetition of promising practice-based interventions. The information collected via these methods is not nationally representative and FNS will not attempt to generalize the findings to be nationally representative or statistically valid.

Fundamental to FNS' success in delivering science-based nutrition messages and reaching diverse and low literacy segments of the population is obtaining qualitative feedback from key components of the target audience on the communication strategies and interventions that will be developed. This formative research is essential to advancing FNS nutrition education and outreach efforts. The formative input and testing methods described in this request will assist in the development of more effective tools,

communication strategies and implementation methods. They will also inform the development of future grants by identifying possible design, scope, and implementation approaches that could be effective for grantees. Collection of this information will increase FNS' ability to formulate nutrition education, outreach interventions, and grants that resonate with and motivate the target population of low-income American families.

3. 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 makes every effort to comply with the E-Government Act, 2002. For example, focus groups concerning Web-site development will be accomplished via computers. The agency also uses electronic methods to collect feedback from stakeholders including program participants/eligibles, State and local staff and others concerning materials that are disseminating through the Web Site and to gather information about how professional use these materials. Online feedback provides ongoing information about the resources, how educators use them, changes needed to increase usability, etc. When feasible, the agency uses web-based surveys and other online tools and will submit screenshots with the information collection request before the system is activated and deployed and before OMB approval. FNS will indicate how much of the anticipated responses will be submitted electronically through the web-based systems.

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

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. Information collection under this package builds on rather than duplicates any prior research. FNS coordinates all information collection thru a central staff located in the Office of Policy Support (OPS) and consults with programs and Center for Nutrition Policy and Promotion (CNPP) about impending data collections. As previously stated, formative input and feedback provide insights into how best to reach and motivate the FNS target populations. The feedback that is collected can also be used to direct the scope and direction of future grants. The attitudes, beliefs, views and perceptions of target audiences evolve and change as other social/environmental changes occur. The Agency reviews information acquired through prior collections, peer review literature and other sources. However, this information collection provides insights into current consumer's perceptions on the usability, appeal, relevance and feasibility of new materials, products, dissemination methods, information seeking preferences, and the design, scope, and implementation approaches of current grants, etc., allowing the agency to make adjustments to improve potential effectiveness of these products.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information collection will not have an impact on small businesses or other small entities.

6. 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 forms in this collection are an ongoing voluntary information collection request; however, ancillary information collections are considered a one-time data collection request. Failure to collect information would decrease the efficacy of resources, tools and interventions. Without this information, FNS will lose valuable input from the culturally and ethnically diverse populations served by the nutrition assistance programs. Research has consistently shown that formative input and consumer testing during development is critical and improves the acceptance and effectiveness of educational materials and processes used to deliver these services. The feedback received from grant recipients is also critical in the development of future grants. This information collection will assist in the development and communication of messages based on the current *Dietary Guidelines for Americans* to the FNS target audience in ways that are relevant and that inspire them to make appropriate changes in behaviors. It will also inform the development of future grants by identifying possible design, scope, and implementation approaches. The target groups for the nutrition assistance programs consists primarily of low-income populations that are at greater risk for developing diet-related health problems such as obesity.

- 7. 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; 12 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. Reporting will occur when necessary in order to carry out multiple information collections for various projects. Some collection instruments such as our forms are recurring requirements and other ancillary collections will be submitted as a one-time collection. This collection also includes two generic submissions that though they were approved under the last renewal, FNS has not yet completed the study activities. This submission also requests approval for one generic submission that could not be submitted before the end of the renewal period.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.**

Notice of this data collection was published in the Federal Register at 83 FR Page 65339 and Volume Number 244 on December 20, 2018. The public comment period ended on February 19, 2019. FNS received four comments in response to the notice (Appendices 1 through 4). None of the comments resulted in changes to the study. Of these comments, one commented on the quality of the food that is provided in the United States (Appendix 1). Another commented on the fact that it is necessary and important that the Department of Agriculture, Food and Nutrition Services, take part in data gathering to better suit the communities that need their support, that in order to promote better eating habits, food security, and overall education and access to food supply, the data gathered over the 3 year period will be used to support the said communities, and that more funding and staffing should be given to FNS to ensure that all the information gathered goes to correct policy changes (Appendix 3). Since these comments did not specifically address the practical utility, quality, and clarity of the information, evaluate the accuracy of the agency's estimate of the burden, or provide comments on minimizing the burden, FNS did not reply to these comments or make any modifications to the collection as the comments were not within the scope of this collection.

Of the other comments FNS received, one stated that obtaining input and feedback from the target audience is essential to help any program ensure their approaches and interventions are appropriate for the community that they are trying to reach and that obtaining feedback is especially important when working with low-income populations as their needs are unique, differ from other economic groups, and can vary from place to place (Appendix 2). The last comment, received from the School Nutrition Association (SNA), recommended that whenever FNS develops materials and resources,

that FNS coordinate across state and local levels to promote their availability and to coordinate with state agencies – as well as with SNA and its state affiliates – to help expand the reach of these materials. The comment further suggested that FNS look beyond the primary audience of school nutrition professionals and their students for such materials and consider how to disseminate the messages and information that would benefit the child’s household, as well as other direct and indirect stakeholders. And finally, the comment encouraged FNS to review grant requirements and consult with both state agencies and local school nutrition directors for feedback on proposed grant designs and the possible impacts on potential applicants and to engage with school nutrition professionals with strong academic credentials and in-depth knowledge of the complex day-to-day operations of the school nutrition programs to help support data collection processes (Appendix 4).

While no modifications were made to the information collection as a result of these comments, FNS did take them into consideration and has forwarded them to the programs who use this generic collection. FNS also sent a reply to the SNA regarding their comment (Appendix 5) but did not send one to the individual who sent the comment in Appendix 2 as no contact information was provided.

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 form, and on the data elements to be recorded, disclosed, or reported.

The 60-day notice published in the Federal Register allows the public and stakeholders an opportunity to comment on this collection. In addition, the agency solicits input from stakeholders through feedback mechanisms such as those previously

approved by OMB, annual plans and reports and personal contacts at meetings and other venues. Due to the nature of this generic clearance, participants for future focus groups, interviews, Web-based surveys and other testing instruments will not be pre-selected, and for this reason there will be no opportunity to consult with them prior to conducting formative research. Since the agency found it challenging and didn't seek outside consultation on this primary package without the supplementary information collection, the program should seek out and provide three (3) contacts for the supplementary packages submitted separately under this collection.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Focus group and selected interview participants may receive a small token of appreciation (i.e., book, small toy or trinket); non-store gift card (i.e., American Express, MasterCard or Discover), or a stipend. Participants may use these incentives as reimbursement for travel or parking, restore minutes used during telephone survey, or offset child care expenses. The stipends can also be used by the sites to purchase equipment, food, and ingredients to be used in the focus group or interview activities. On occasion, the agency along with our contractors or facilitators will organizer child care onsite or provide light refreshments for focus group participants. Amounts and justifications will be determined on an individual project basis. This information will be included in the memo provided to OMB for each formative research project.

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

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on March 31, 2000, Volume 65, Number 63, and is located on pages 17251-17252 discusses the terms of protections that will be provided to respondents. If there is more than one applicable SORN, FNS will apply and provide the supplemental information. Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the secure treatment of records maintained by a Federal agency and its contractors according to either the individual's name or some other identifier. Individuals participating in this study will be notified that the information they provide will not be published in a form that identifies them. No identifying information will be attached to any reports. Identifying information will not be included in the public use dataset. Names and phone numbers, or any other unique identifier, will not be linked to the data. Interview and observation respondents will be assigned a unique ID number and analysis will only be conducted on data sets that include these unique ID numbers. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases. Access to records is limited to our contractors' staff who signed their company's confidentially forms who process the records for the specific uses stated in this Privacy Act notice. These agreements will be provided as part of the request in each ancillary generic information request submit to OMB for approval. Records in such formats as magnetic tapes and disks are kept in physically secured rooms and/or cabinets. Various methods of computer security limit access to records in automated

databases (such as file encryption/locking too). Names and phone numbers will be destroyed within 12 months of the end of the contract.

FNS and its contractors will follow all procedures for assuring and maintaining privacy consistent with the Privacy Act during all stages of data collection. Focus group participants will receive information about privacy in an advance letter and/or before the focus groups begin. Participants in the semi-structured intercept interviews and telephone interviews will receive information about privacy before beginning the interviews. In the event of any video or tape recording of the focus group participants or observation FNS will provide advance notification. When appropriate, respondents will be informed that all information will be kept private by the information collection team and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law.

Release forms for focus groups and interviews are voluntary and individuals will be given the opportunity to provide consent or opt out of the entire study or specific questions without penalties or benefits withheld, this information will be provided to the eligible participant and the Privacy Act will be cited on applicable instruments and submitted for OMB approval. FNS does not have any connection to the personal data collected and the only information FNS handles is the aggregated report which contains no personal information and is publicly posted. Data will be presented in aggregate statistical form only. The specific safeguards will be explained in each ancillary generic request submitted to OMB for approval.

When necessary, FNS and its contractors consult with Institutional Review Boards (IRB) who serve as the organization's administrative body; the IRB conducts prospective reviews of proposed research and monitors continuing research for the purpose of safeguarding research participants' rights and welfare. All research involving interactions or interventions with human subjects is within the purview of our contractor's IRB. The contractors are responsible for ensuring that the organization's research: 1) meets the highest ethical standards; and 2) receives fair, timely, and collegial review by an external panel. We will note those IRB that hold a federal-wide assurance (FWA) of compliance from the U.S. Department of Health and Human Services' Office of Human Research Protections (DHHS/OHRP). All study materials, screenshots of instruments, English & Spanish translation instruments (or any other languages) and advance and follow-up communication instruments for the federally supported research or research that involves human subjects, will be submitted to the IRB for review before the request is forwarded to OMB for approval. Once the materials are approved by the IRB, copies of the IRB exemption approval letters will be included with the submissions.

In the event there is an electronic system developed, a Privacy Impact Assessment (PIA) will be conducted with the Department and FNS Privacy Act Officer before OMB approval prior to deploying the system. We will indicate whether or not a consensus was reached by the Privacy Officers, whether a PIA was or was not required for a data collection request package, whether or not FNS staff will or will never handle or see any of the personal data collected, and we will provide the contractors name and whether or not the contractor's system does or does not tie into any of FNS' data

management/analysis systems. We will also indicate whether the data creation and processing system was or was not created for this contract agreement and that FNS does not have any say so on the contractor's system. In accordance with OMB M-03-022: OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, FNS will indicate whether or not PIA is required when collecting non-identifiable information for a discrete purpose.

11. 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.

Information collection will not involve questions of a sensitive nature. Some of our studies do collect breastfeeding information, income data and other demographics, gender, and race & ethnicity, which can be considered a sensitive nature. In these circumstances, we will provide justifications why this information need to be included.

FNS and its contractors will use the OMB standards for data on race and ethnicity which provide a minimum set of two categories for data on ethnicity. When race and ethnicity is asked, FNS will ask the ethnicity followed by the race in the following manner:

1. Hispanic or Latino
2. Not Hispanic or Latino

Five OMB approved categories for data on race collected from individuals:

1. American Indian or Alaska Native,

2. Asian,
3. Black or African American,
4. Native Hawaiian or Other Pacific Islander, and
5. White

Note: “other race” is not an OMB approved response category. Respondents are to be offered the option of selecting one or more racial designations. Based on research findings, the recommended forms for the instruction are *Mark one or more*, *Select one or more*, or *Choose one or more* (not check all that apply).

In the case of gender, options will be provided for respondents to identify their gender as female, male, or transgender. Respondents will also have the option to select “other” and specify their gender designation.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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 information collection has 120,710 respondents, 120,710 responses, and 46,823 burden hours. Estimates are based on both the historical numbers of respondents from past projects as well as projections of projects to be conducted over the next three years. These burden estimates account for complete responses or partial responses and will be identified as a respondent who participates fully or in part and non-respondents those individuals we have reached out to and they decline to participate. For greater precision, oversampling is conducted to obtain a certain number of subgroups in the public who make up the population.

0584-0524 Requested Respondents, Responses, and Burden Hours – 3 Year Totals

Research Method	Number of Respondents	Frequency per Respondent	Total Responses	Time per Response (Hours)	Total Burden in Hours
Focus Group Screeners	11,250	1	11,250	0.25	2,813
Interview Screeners/Surveys	22,500	1	22,500	0.25	5,625
Focus Groups	6,750	1	6,750	2	13,500
Intercept Interviews	2,000	1	2,000	0.5	1,000
Dyad/Triad Interviews	3,000	1	3,000	1	3,000
Telephone Interviews	13,500	1	13,500	0.5	6,750
Surveys	7,000	1	7,000	0.5	3,500
Web-based Collections	4,500	1	4,500	0.5	2,250
Confidentiality Agreements	30,000	1	30,000	0.167	5,010
Forms (web-based consumer feedback, response, pre/post-test forms, etc.)	20,210	1	20,210	0.167	3,375
3- Year Total Requested:	120,710	1	120,710	0.39	46,823

Burden Hours and Responses for the Three Generic IC Submissions Included in This Submission

Generic IC Submission	Number of Respondents	Frequency per Respondent	Total Responses	Time per Response (Hours)	Total Burden Hours
Improving School Meal Program Accuracy through Pre-Ordering and Grab and Go Systems – SA, SFAs, and Schools (SLT)	21	9.142	192	1.328	255
Improving School Meal Program Accuracy through Pre-Ordering and Grab and Go Systems – Students (Individuals and Households)	18,000	2	36,000	0.010	360
Total for Improving School Meal Program Accuracy	18,021	2	36,192	.02	615

Mealtimes with Toddlers in the Child and Adult Care Food Program (SLT)	720	2.875	2,070	166.74	167
Collection of Produce Safety University Course Feedback and Program Impact Data	206	3	618	.250	155
Total	18,947		38,880		937

Note: The Improving School Meal Program Accuracy and the Mealtimes with Toddlers submissions were approved under OMB #0584-0524 late in the approval period so FNS included them in this renewal to keep the approval current while the agency finishes up the study activities. FNS is seeking approval for the Collection of Produce Safety University Course Feedback under this submission. Please note that the burden hours shown above for these submissions are accounted for under the burden estimates shown in the chart above for the 0584-0524 Requested Respondents, Responses, and Burden Hours – 3 Year Totals. The totals shown above are being added to the totals shown below for the continued clearance items to get the total burden that is being used for all of the information collections that are being submitted under this renewal.

Continued clearance is requested for the following activities and instruments that are currently cleared in this collection. These are ongoing activities and instruments that are carried forward as part of each renewal of the base generic clearance

Instrument/Activity	Form Number	Affected Public	Estimated No. of Annual Respondents	Frequency per Respondent	Total Annual Responses	Estimated Time (Hours) per response	Total Burden Hours
Team Nutrition School Enrollment Form	FNS-781	State, Local, Tribal Gov't	6000	1	6000	0.083	500.00
Power Panther	FNS-807	State, Local,	105	1	105		

Costume Request and Agreement Form		Tribal Gov't				0.250	26.25
Power Panther Costume Event Feedback Form	FNS-808	State, Local, Tribal Gov't	105	1	105	0.167	17.50
FNS Visitor Form	FNS-814	State, Local, Tribal Gov't	105	1	105	0.167	17.50
Level 1 Event Feedback Form	FNS-816	State, Local, Tribal Gov't	1500	1	1500	0.083	125
Level 3 Event Feedback Form	FNS-817	State, Local, Tribal Gov't	1500	1	1500	0.167	250
Attendee Evaluation Form	FNS-854	State, Local, Tribal Gov't	3000	1	3000	0.083	250
Miscellaneous CN, SNAP, and CNPP Customer Service Forms		State, Local, Tribal Gov't	1000	1	1000	2.000	2,000
Subtotal for Consumer Research for Nutrition Education and Promotion Activities - SLT IC			13,315	1	13,315	.239	3,186.25
FNS Visitor Form	FNS-814	Business	105	1	105	0.167	17.50
Level 1 Event Feedback Form	FNS-816	Business	300	1	300	0.083	25
Level 3 Event Feedback Form	FNS-817	Business	300	1	300	0.167	50
Attendee Evaluation Form	FNS-854	Business	600	1	600	0.083	50
Subtotal for Consumer Research for Nutrition Education and Promotion Activities - Business IC			1,305	1	1,305	.109	14 2.50
Team Nutrition Educational Technology Environmental Scan*		State, Local, Tribal Gov't	2980	1	2980	0.168	501
Grand Total (3 years)			17,600	1	17,600	0.218	3,829.78

* 1 year burden because the collections are ending this year (2019) in 0584-0524

Summary	Number of Respondents	Frequency/ Number of Responses	Total Annual Responses	Time per Response (Hours)	Total Annual Burden in Hours
3- Year Total Requested:	120,710	1	120,710	0.39	46,823
Total Used for ICs submitted with this renewal:	36,547	1	56,480	0.22	4,766
Total Remaining:	84,163	.763	64,230	.654	42,057

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

Testing Instrument or Method	Total Burden Hours	Hourly Rate (\$)	Total Cost
Focus Group Screeners	2,813	\$ 14.38	\$ 40,443.75
Interview Screeners/Surveys	5,625	\$ 16.25	\$ 91,406.25
Focus Groups	11,475	\$ 16.25	\$ 86,468.75
	2,025	\$ 27.22	\$ 55,120.50
Intercept Interviews	1,000	\$ 16.25	\$ 16,250.00
Dyad/Triad Interviews	3,000	\$ 16.25	\$ 48,750.00
Telephone Interviews	6,750	\$ 27.22	\$ 109,687.50
Surveys	3,500	\$ 16.25	\$ 56,875.00
Web-based Collections	2,250	\$ 27.22	\$ 61,245.00
Confidentiality Agreements	4,259	\$ 16.25	\$ 69,208.75
	752	\$ 27.22	\$ 20,469.44
Forms (web-based consumer feedback, response, pre/post-test forms, etc.)	3,375	\$ 16.25	\$ 54,843.75
Total	46,781		\$ 710,758.69
Fringe Benefits	-	-	\$234,550.37
Grand Total with Fringe Benefits	-	-	\$945,309.06

- \$16.25 mean hourly wages file clerks [Source: U.S. Department of Labor, Bureau of Labor Statistics: Occupational Employment and Wages, May 2018 <https://www.bls.gov/oes/current/oes434071.htm>]
- \$27.22 mean hourly wage for educators/teachers [Source: U.S. Department of Labor, Bureau of Labor Statistics: Occupational Employment and Wages, May 2018 <https://www.bls.gov/oes/current/oes250000.htm>]

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 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.

For the respondents there are no capital /start-up or operating/ maintenance costs associated with this collection. The only cost to respondents will be value of the time spent responding as explained in chart above.

14. Provide estimates of annualized cost to the Federal government. Also, 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 Agency incurs costs in setting up testing environments to include such things as hiring contractors, facilitators or moderators, renting meeting space, in providing cash stipends, etc. Costs will be determined on an individual project basis and will be included in the memo provided to OMB for each formative research project. Based on historical data and expenditures over the last three years we project annualized cost to be about \$400,000. FNS will detail costs associated with ancillary information collections submitted under this request to include contract cost and other costs such as Federal Government salaries associated with drafting, reviewing, and monitoring this information collection. These cost will be determined on an individual project basis. This information will be included in the memo provided to OMB for each formative research project.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a revision of a currently approved information collection. The estimated burden for this generic has slightly increased from the last submission. The currently approved 3-year total burden hours in OMB inventory is 46,781 burden hours and 120,500 total responses. We are requesting 46,823 total burden hours and 120,710 total responses. This is an increase of 42 hours and 210 responses due to program changes from including a new form FNS 814. This form is being added as one of the ongoing instruments that are approved under this generic and carried forward through the renewals so we have increased the total burden to account for this new form. The burden for the generic submissions for Improving School Meal Program Accuracy through Pre-Ordering and Grab and Go Systems and the Mealtimes with Toddlers in the Child and Adult Care Food Program is already included in the burden hours requested above. After reviewing the burden for the generic IC submission for the Collection of Produce Safety University Course Feedback and Program Impact Data that FNS is submitting for review and approval under this renewal, FNS has determined that we do not need to increase the burden for the base collection to account for this submission. This is a one-time submission and FNS believes that the burden hours requested will cover this submission, in addition to the future submissions that will be made under this generic. If in the future, FNS finds that this is an ongoing submission, FNS will either adjust the burden hours for the base clearance to account for it being added as ongoing instruments that are carried forward through the renewals or will prepare it as a separate information collection. After increasing the burden for on-going collections submitted with this revision, the requested hours are 46,823 and responses are 120,710. The Agency believes that the

number of hours, responses, and respondents requested will be sufficient to meet the needs of data collection events over the next three years.

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

Contractors will provide summarized findings of all research in reports to USDA-FNS. These reports will describe the research methods used, findings, conclusions, implications, and recommendations to enhance development of nutrition education and outreach materials for low-income population groups. In the reports, the Contractors will address recommendations to enhance resources and effective dissemination strategies. The reports will also describe some of the factors that may influence the target audience in making behavior changes.

FNS will not use complex analytical techniques for data resulting from collection of information under the generic package. There will be no extensive quantitative analysis of data. No attempt will be made to generalize the findings as nationally representative or statistically valid.

After completion of data collection and clearance of reports, the findings may be reported in appropriate journals, professional meetings and conferences, training for FNS and program staff, etc. in order to disseminate the information and promote appropriate use to those who interact with a similar target audience.

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

FNS is not seeking exemption from this requirement.

**18. Explain each exception to the certification statement identified in Item 19
"Certification for Paperwork Reduction Act."**

No exceptions to the certification statement are requested.