

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

SFA Survey II on School Food Supply Chain Disruption and Student Participation

September 15, 2022

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A1. 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 Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting emergency approval under the Paperwork Reduction Act (PRA) to conduct a new survey of school food authorities (SFAs) to collect information on the continued impacts of COVID-19-related supply chain disruptions on the Child Nutrition (CN) Programs, as well as emerging challenges related to the transition back to standard school nutrition program operations. FNS cannot reasonably comply with the normal clearance procedures under the PRA because complying would delay the agency's ability to provide emergency nutrition assistance to families and children who continue to be impacted by COVID-19. As such, we request expedited approval of this information collection.

FNS is the sole agency responsible for the administration of the CN programs—including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), NSLP Seamless Summer Option (SSO), the Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), and others—at the federal level. Although FNS oversees these programs, State agencies (SAs) administer them through agreements with SFAs and other local entities that implement the programs at the local level. In recent months, SFAs have provided anecdotal evidence of new challenges, including vendors discontinuing school food service operations and submitting fewer bids for school food service contracts, and continued challenges related to food cost and labor. SFAs also anticipate potential complications associated with the transition to standard school nutrition operations. To inform current and future policy decisions and effectively oversee these programs, FNS requires more comprehensive information on these and other emerging challenges local program operators are facing as they begin SY 2022-2023.

This collection is authorized under Section 28(a)(1) of the Richard B. Russell National School

Lunch Act (NSLA), which authorizes the USDA Secretary to conduct annual national performance assessments of the school meal programs and requires States and local entities participating in the programs to cooperate with program research and evaluations (Appendix A). Furthermore, Section 305 of the 2010 Healthy Hunger-Free Kids Act (HHFKA) amended Section 28 of the NSLA by adding the following:

“(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.”

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.

The primary purpose of this information collection is to obtain data on the impacts of emerging school food supply chain disruption, as well as impacts of the return to standard school nutrition operations on school districts and students nationwide via the SFA Survey II on Supply Chain Disruption and student participation (Appendix B), which is a maximum 31 question web survey of all 19,050 SFAs that operate the CN Programs. In particular, the survey will provide nationwide information on the extent of school food vendor, cost, and labor issues that have been identified anecdotally in recent months, as well as issues related to student participation. FNS will use the information obtained through this survey to develop tailored resources, tools and flexibilities to support school districts in serving students healthy and nutritious meals during this challenging time. This is a mandatory collection for both States and SFAs.

FNS will utilize SFA contact information obtained from the SFA Survey I on School Food Supply Chain Disruptions for the 56 State CN agencies that administer the CN Programs at the state level

in the 50 States, District of Columbia, Guam, Puerto Rico, and U.S. Virgin Islands. FNS will first contact SAs with a Survey Support Email (Appendix C) to be distributed to the SFAs in their respective States letting SFAs know that the survey is coming and to express their support for the collection. Shortly thereafter, FNS will email the SFA Survey on Supply Chain Disruption (Appendix B) to each SFA via the Qualtrics Survey Software platform.

FNS intends to collect data over a 4-week period. SFAs that have not yet completed their surveys will receive a reminder email (Appendix D) each week. FNS expects each SFA to receive 2 reminder emails, on average. Upon completion of the survey, FNS will send each SFA a thank you email (Appendix E). Because supply chain disruption is an urgent issue affecting school districts nationwide and this short survey presents an opportunity for SFAs to communicate their challenges and frustrations directly to FNS, FNS expects all 19,050 SFAs to respond within this 4-week period.

FNS requires the survey results by November 15th, 2022 in order to act on the information in a timely fashion given the dynamic situation of supply chain disruptions, and is requesting approval of this information collection through April 30th, 2023.

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 of 2002 to promote the use of technology. The team will administer the web survey to SFAs using the Qualtrics web survey platform. Online surveys enable efficient survey participation, as programming limits questions to relevant respondents and will constrain data ranges, keeping responses within a certain length and simplifying data cleaning. Web surveys also allow respondents to complete and submit data securely using unique, password-protected logins. Respondents may save their progress, facilitating completion of the survey in

more than one session.

FNS estimates that out of a total of 95,315 responses for this study, 19,106 responses (20%) will be collected electronically.

A4. Efforts to identify duplication.

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.

FNS has made every effort to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. The data we seek to collect are specific to the urgent and evolving supply chain situation SFAs are currently experiencing and, to our knowledge, these data are not currently being collected elsewhere. This data builds on and is distinct from the data collected in the prior SFA Survey on Supply Chain Disruption in that it provides information about emerging SY 2022-2023 challenges related to supply chain disruptions, focusing specifically on school food vendor, cost, and labor issues, and challenges related to the transition to standard school nutrition program operations.

A5. Impacts on 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.

Information being requested or required has been held to the minimum required for the intended use. Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. FNS estimates that out of the total 19,106 respondents for this collection, 74 percent of our respondents are small entities (school districts with less than 50,000 students), representing approximately 14,138 respondents.

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.

This is a one-time data collection that is necessary in order for FNS to fully understand the impacts that supply chain disruption is having on school districts' abilities to provide healthy and nutritious meals to students this school year. If FNS did not collect these data, FNS would not be able to provide the tailored resources, tools and flexibilities necessary for local program operators to continue providing reimbursable meals and snacks to children through the federal Child Nutrition Programs. Additionally, without this collection, FNS would not be able to accurately track and report on school food supply chain disruption to the Executive Office of the President.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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.

This information collection is intended to assist with accurately tracking and reporting activity on school food supply chain disruption to the Executive Office of the President. Given the urgency of the issue and the need to identify potential solutions and flexibilities quickly, FNS is requesting that State CN Directors submit SFA contact information within 1 week of the request and that SFA Directors complete their web surveys within 4 weeks of receipt.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

- **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.**
- **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

This is a request for emergency approval under the PRA. Due to the urgent and evolving supply chain situation and need to collect these data quickly, FNS was not able to post for public comment in the Federal Register. However, FNS consulted with 9 SFA Directors across all 7 FNS regions in August 2022 as part of the pretest (Appendix F) for the SFA Survey on Supply Chain Disruption. With permission,

their names, titles, and contact information are listed in Table 1 below.

Table 1. Pretest Participants

Name	Title	State	Email
Becky Hardin	Cafeteria Director, Rosary Catholic School	Oklahoma	cafeteria@rosaryschool.com
Brigitte Clark	District Clerk, Geraldine Public Schools	Montana	brigittec@geraldine.k12.mt.us
Dawn Smith	Director of Food and Nutrition, School District of Beloit	Wisconsin	dsmith7@sdb.k12.wi.us
Dean Gallegos	Director, Food Service, Rio Rancho Public Schools	New Mexico	dean.gallegos@rrps.net
Debby Webster	Nutrition Services Director, Rainier School District	Oregon	debby_webster@rsd.k12.or.us
Jacob Wood	Business Administator, Essex North Supervisory Union	Vermont	jwood@ensvut.org
Joe Urban	Director of Food and Nutrition Services, Greenville County Schools	South Carolina	jmurban@greenville.k12.sc.us
Kristen Osborn	School Nutrition Director, Gunnison Watershed School District	Colorado	kosborn@gunnisonschools.net
Sylvana Bryan	School Nutrition Director, Pittsfield Public Schools	Massachusetts	sbryan@pittsfield.net

Pretest participants reported spending from 15-30 minutes on the survey, with an average time of 19 minutes. Because several response options were added to the survey based on participant feedback, we believe that a 20 minute estimate for survey completion is accurate. All participants provided positive feedback on the overall content and structure of the survey, and suggested that the survey would be well-received by SFAs given its timeliness and ease of completion. Participants did not identify any questions that were particularly burdensome or time consuming to respond to, though several recommended expanding the survey introduction to let respondents know that they may need to reference records from

previous years, including labor costs, food costs, and student participation, during the survey.

Although participants overwhelmingly agreed that the response options provided in the survey were relevant and appropriate, about half indicated that the list of response options was too lengthy for several questions. In response to this feedback, FNS limited the number of unique response options per question to no more than 15, creating separate questions with fewer response options as needed. Several participants also indicated that it would be useful to provide definitions of some less commonly used terms, which will be addressed through the Qualtrics survey platform, and recommended providing more direct reference points (e.g., “in a typical pre-pandemic year”) for questions asking respondents to compare across time periods. In response to these suggestions and other more specific participant feedback, FNS made the following changes to the survey:

- Question 2
 - Added details to clarify what household applications meant.
- Question 3
 - Provided more information to help clarify the meaning of “vended meals company.”
- Question 4
 - Provided a reference point with respect to “high food costs” and “high labor costs” (compared with a typical pre-pandemic school year).
 - Clarified “insufficient bids for food service contracts” by rephrasing as “low number of bids for food service contracts.”
 - Added response option to address pretest feedback: “Receiving items that are damaged or unusable due to distributor issues.”
 - Deleted response option: “Difficulty maintaining compliance with meal pattern requirements,” as it is named as an impact in Question 8.
 - Deleted response options related to local foods and scratch cooking, which are now included as part of skip patterns later in the survey, to reduce number of response options.

- Question 5
 - New question added to direct respondents to question about USDA Foods or skip past it.
- Question 6 (previously Question 5)
 - Added response option “Difficulty buying as much food as we would like due to lack of storage space.”
 - Deleted response option “Difficulty maintaining compliance with meal pattern requirements,” as it is named as an impact in Question 8.
- Question 7 (previously Question 6)
 - Simplified question language to avoid confusion: “How are the challenges your SFA is experiencing impacting school meal operations?”
 - Provided examples to clarify response option based on pretest participant feedback: “confusion from students or parents/guardians regarding shift to standard program operations, including changes to meal service, payment, or paperwork.”
 - Added “Staffing challenges due to changes in meal preparation or service (e.g., from grab-and-go to cafeteria meals).”
- Question 8 (previously Question 7)
 - Consolidated “Difficulty maintaining routine program documentation” with “Inability to fulfill other job requirements” and provided more clarity.
 - Provided more clarity on “Inability to offer enough reimbursable meals to participating children due to lack of food or service materials” and “Changes in meal preparation methods (e.g., scratch cooking to grab-and-go meals).”
 - Added “Increased competition from nonprogram (competitive) or off-campus food sales”
 - Added “Difficulty retaining enough staff with adequate skills and training”
- Questions 9-10 (previously Question 8)
 - Split into Question 9 (purchasing strategies) and Question 10 (other strategies)

- o Deleted response options: “Partnering with restaurants, catering companies, or community partners...” due to confusion, the fact this could be considered cooperative purchasing, and skepticism that this was happening frequently.
- Question 9 (purchasing strategies)
 - o Provided more clarity on “Purchasing foods directly from grocery stores or warehouses re-tail outlets” and other minor changes.
 - o Added “Increasing communication with vendors, distributors, or manufacturers to identify available products.”
 - o Added “Increasing use of local vendors and/or working with multiple vendors.”
 - o Consolidated “Requesting shorter bids and/or making more frequent orders.”
 - o Added “Increasing local food purchases” and “decreasing local food purchases” as strategies.
 - o Added “Planning further ahead and/or placing orders further in advance.”
- Question 11 (previously Question 9)
 - o Provided more clarity on “Used state funding to cover the cost of reduced-priced meals.”
 - o Provided more clarity on “Communicating more with parents/guardians about program changes (e.g., changes to meal service, payment, or applications.)”
 - o Added “Increasing communication and/or training with staff about program changes.”
- Question 13 (previously Question 11)
 - o Added “Changes in meal preparation or service (e.g., from scratch cooking to ready-to-eat meals).”
 - o Added “Substitutions for unavailable items are more expensive.”
 - o Consolidated “Vendors, distributors, or manufacturers increased costs.”
 - o Provided more clarity on “Using own transportation to transport food more frequently.”

- o Deleted “My SFA procures high quality food products, which have become more expensive” because it doesn’t give us meaningful information beyond overall food cost increase; “My SFA procures local food, which has become more expensive” because it is included elsewhere now.
- Question 15 (previously Question 13)
 - o Added “Wage increases implemented by SFA to hire and retain staff” to distinguish from “Wage increases due to factors beyond SFA control (e.g., state minimum wage increase).”
- Question 17 (previously Question 15)
 - o Added “Decrease in enrollment;” “Meals are no longer free for all students.”
- Question 21 (previously Question 19)
 - o Consolidated “Federal, state, or local procurement regulations (please specify.)”
- Question 22, 23, 24, and 25 were added to provide skip pattern for local foods and scratch cooking and reduce response options for previous questions.
- Question 27 (previously Question 21)
 - o Added “Missed deadline to apply for funds;” “Unclear on the intended use or recipient of funds.”
- Question 29 (previously Question 23)
 - o Added “Kitchen equipment repair or maintenance.”

There were a number of recommendations made by pretest participants that FNS declined to incorporate into the survey, all of which related to Question 7. The rationale for declining these recommendations is provided below:

- Question 7 (previously Question 6)
 - o Declined to incorporate challenge named by one pretest participant (difficulty contacting parents to refund surplus school food credits from past year) because it did not seem to be a pressing concern, or one shared by others.

- Several pretest participants indicated that the survey would be issued too early in the school year for SFAs to have reliable information about unpaid school meal debt. However, this was left as an option because other pretest participants confirmed that there would be information about unpaid school meal debt. However, when survey results are collected, we should interpret findings from this particular response with this consideration in mind.
- Pretest participants were divided on whether “leveraging state contracts” was clear, but agreed that adding “piggybacking” did not improve clarity. It was left as-is, assuming those who use this option will recognize it.
- Pretest participants agreed ranges were better than blanks, and in some cases proposed narrower ranges. This recommendation was not adopted because providing narrower ranges would not change how FNS would utilize this information.

A9. Explain any decisions to provide any payment or gift to respondents.

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

No payments or gifts are provided to respondents under this collection.

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.

The Department complies with the Privacy Act of 1974. No confidential information is associated with this collection of information and no such assurances of confidentiality are provided. This ICR does not request any personally identifiable information nor does it contain any forms that require a Privacy Act Statement.

A11. Justification for any questions of a sensitive nature.

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.

No private or sensitive questions will be asked.

A12. Estimates of the hour burden of the collection of information.

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 new information collection request. With this submission, there are 19,106 respondents, 95,315 responses, and 8,840.79 burden hours. The average number of responses per respondent is 4.99. Table 2, Annual Burden Estimate, and Appendix G show the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials, affected stakeholders, and prior experience in collecting similar data.

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

The estimates of annualized costs to State and local governments and private, not for profit businesses are based on the burden estimates and utilize the U.S. Department of Labor, Bureau of Labor Statistics, May 2021 National Occupational and Wage Statistics for Occupational Groups 999200: State Government (https://www.bls.gov/oes/current/naics4_999200.htm) and 611000: Elementary and Secondary Schools (http://www.bls.gov/oes/current/naics4_611100.htm). Annualized costs are based on the mean hourly wage. The estimated annualized cost for State government, which includes State CN directors

(Occupation Code 11-9030, Education and Childcare Administrators), is \$465.27 ($\$49.84/\text{hr.} \times 9.34$ hours). The estimated cost of this data collection for local government, which includes SFA directors in public schools (Occupation Code 11-9039, Education Administrators, All Other), is \$342,778.94 ($\$47.24/\text{hr.} \times 7,256.12$ hours). The estimated cost of this data collection for private, not for profit businesses, which includes SFA directors in private schools (Occupation Code 11-9039, Education Administrators, All Other), is \$74,419.21 ($\$47.24/\text{hour} \times 1,575.34$ hours). Including an additional \$137,828.93 to account for fully loaded wage rates ($\$417,663.42 \times 0.33$), the estimated annualized total cost to respondents associated with this collection is \$555,492.35

Table 2. Annual Burden Estimate

Respondent Category	Type of respondents (optional)	Instruments	Appendix	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
State Government	State Child Nutrition Directors	Survey Support Email	C	56	1	56	0.1667	9.3352	\$49.84	\$465.27
Local Government	SFA Directors	Pretest	F	9	1	9	0.8333	7.4997	\$47.24	\$354.29
		Survey Support Email	C	15649	1	15,649	0.0333	521.1117	\$47.24	\$24,617.32
		SFA Survey II on Supply Chain Disruption	B	15649	1	15,649	0.33	5164.17	\$47.24	\$243,955.39
		Reminder Email	D	15649	2	31,298	0.0333	1042.2234	\$47.24	\$49,234.63
		Thank You Email	E	15649	1	15,649	0.0333	521.1117	\$47.24	\$24,617.32
STATE AND LOCAL GOVERNMENT SUBTOTAL				15,705	4.986	78,310	0.093	7,265.45		\$ 343,244.21
Private, Not-For-Profit Businesses	SFA Directors	Survey Support Email	C	3401	1	3,401	0.0333	113.2533	\$47.24	\$5,350.09
		SFA Survey on Supply Chain Disruption	B	3401	1	3,401	0.33	1122.33	\$47.24	\$53,018.87
		Reminder Email	D	3401	2	6,802	0.0333	226.5066	\$47.24	\$10,700.17
		Thank You Email	E	3401	1	3,401	0.0333	113.2533	\$47.24	\$5,350.09
PRIVATE, NOT-FOR-PROFIT BUSINESSES SUBTOTAL				3,401	5.000	17,005	0.093	1,575.34		\$74,419.21
TOTAL				19,106	4.989	95,315	0.093	8,840.79		\$ 417,663.42
.33% to Account for Fully Loaded Wage Rate										\$137,828.93
TOTAL REPORTING BURDEN (Fully Loaded)										\$555,492.35

A13. Estimates of other total annual cost burden.

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. Provide estimates of 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.

The total annualized cost to the Federal government is \$21,659. This includes a total of 300 hours annually of Federal employee time—200 hours for a GS-13, Step 1 at \$51.18 per hour for a total of \$10,236 and 100 hours for a GS-14, Step 1 at \$60.49 per hour for a total of \$6,049—plus \$5,374 to account for fully loaded wages (\$16,285 x 0.33). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2022 for the Washington, DC locality (Office of Personnel Management. 2022. Salary table 2022-GS. Retrieved from https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf).

A15. Explanation of program changes or adjustments.

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

This submission is a new information collection request as a result of program changes and will add 8,840 hours of burden to OMB's inventory attributable to 95,315 total annual responses.

A16. Plans for tabulation, and publication and project time schedule.

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

Plans for publication have not yet been determined. The project schedule is as follows:

Collect SFA Contact Information from State agencies	Immediately following OMB approval
Collect SFA survey data	October 15 – November 15 or beginning 1 week after OMB approval
Analyze and share survey data with federal partners	November 15 – December 15 or beginning 5 weeks after OMB approval

A17. Displaying the OMB Approval Expiration Date.

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. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

FNS does not have any exceptions to the certification statement.