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Office of Management and Budget (OMB)

THROUGH: Jamia Franklin, FNS Information Collection Officer  
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FROM: Constance Newman, Senior Analyst  
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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  
move two survey questions with a slight increase in 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.

The change is needed so that we can fully assess any differences in the way CACFP providers function based on the nature of their sponsorship type. Sponsors serve many providers as the hub for administrative functions, establishing food preparation policies, monitoring, and more. In SNACS-II, we ask sponsors about costs and other administrative functions that they perform, and we ask about the nature of their organization. We had put the sponsorship type questions in the cost survey, in the survey instrument called Pre-Visit Cost Telephone Interview. However, upon review, we realized that we wanted to collect sponsorship type for all of the participating providers, not just those selected to participate in the smaller sample of sponsors that are asked to

respond to the cost survey questions. Therefore, we would like to move the sponsorship type questions, with some slight changes, to the Provider Survey that will be asked of all providers.

Specifically, we first propose to delete a question about sponsorship type that was directed to sponsors only in the Pre-Visit Cost Telephone Survey. (We retain the first part of question 1 to reinforce the information collection as previously planned.) This is a screenshot of the changes proposed in the Pre-Visit Cost Telephone Survey:

**General**

1. **CENTERS ONLY:** First, I have some questions about the organizations involved in administering the CACFP at [SAMPLED CHILD CARE CENTER]. Is the [SAMPLED CHILD CARE CENTER]...

- 1  Sponsored and affiliated (part of the sponsor organization)? **ASK 1B GO TO 2**
- 2  Sponsored and unaffiliated (not legally part of the sponsor organization)? **ASK 1B AND 1C**
- 3  Independent (has its own agreement with the State to operate the CACFP)? **ASK GO TO 1C**

~~1b. SPONSORS ONLY: How would you describe your sponsor organization? Is it a...?~~

- ~~1  Private non-profit organization~~
- ~~2  Public school district~~
- ~~3  Charter school organization~~
- ~~4  Local government such as town, city, or county~~
- ~~5  For-profit corporation~~
- ~~6  Other (specify) \_\_\_\_\_~~

~~IF CENTER IS AFFILIATED, GO TO 2~~

1c. What type of organization is the [SAMPLED CHILD CARE CENTER]? Is it a...?

- 1  Private non-profit organization
- 2  Public school or other part of a public school district
- 3  Local government such as town, city, or county
- 4  For-profit corporation
- 5  Other (specify) \_\_\_\_\_

The new questions in the Provider Survey would be these:

IF SPONQ=1 AND SPONSOR =1

**M1.0. Sponsored centers can be either affiliated or unaffiliated. An affiliated center is owned, in whole or in part, by a CACFP sponsoring organization. An unaffiliated center is legally distinct from its sponsoring organization. Is [SAMPLED CHILD CARE SITE] affiliated or unaffiliated with its sponsor?**

- Affiliated (part of the sponsor organization) ..... 1
- Unaffiliated (not legally part of the sponsor organization) ..... 2
- Don't know ..... d
- NO RESPONSE ..... M

IF SPONQ=1 AND SPONSOR =1

**M1.0a. What type of organization is [SAMPLED CHILD CARE SITE]'s sponsor?**

- Private non-profit organization ..... 1
- Public school district or local government such as town, city, or county ..... 2
- Charter school organization ..... 3
- For-profit corporation ..... 4
- Other (SPECIFY) ..... 5
- Specify  (STRING)
- Don't know ..... d
- NO RESPONSE ..... M

The estimated change in burden is 1.438 hours as shown in the table below. There is an estimated 239 sponsors who would have spent 45 seconds each for a total time of 2.988 hours on the three-part question. And an estimated 531 providers are expected to spend 30 seconds on the two new questions for a total of 4.425 hours. The difference is an additional 1.438 hours of burden overall.

	Number	Total time (sec)	Total time (hours)	Difference (hours)
<b>Sponsors: Pre-Visit Cost Interview (current)</b>				
Recruited sponsors w/ ≥ 1 provider in cost study	239	10,755	2.988	
Time to answer both questions (seconds)	45			
<b>Providers: Provider Survey (proposed)</b>				
Sponsored providers	531	15,930	4.425	1.438
Time to answer both questions (seconds)	30			

The change will increase the total annualized cost of respondent burden by \$44.08. This reflects a decrease of \$104.94 for sponsors and an increase of \$149.01 for providers.

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:**

E1\_Pre-Visit Cost Telephone Interview\_2022.09.27

F7\_Provider Survey\_English\_2022.09.27

F8\_Provider Survey\_Spanish\_2022.09.27

SNACS-II sponsorship Q burden estimates

N\_Sample Sizes Estimated Burden and Estimated Cost of Respondent Burden\_2022.09.27