

**Supporting Statement for OMB Clearance for the School Meals Operations
Study: Evaluation of the School-based Child Nutrition Programs**

Part A

Revision to OMB # 0584-0607, School Meals Operations Study (SMO)

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Introduction

This information collection request is for a revision of the approved collection for the School Meals Operations (SMO) Study (OMB Control No. 0584-0607, expiration date: 12/31/2024), which collects data annually through various combinations of online surveys of school food authority (SFA) Directors and State Child Nutrition (CN) Directors, and a disaggregated administrative data collection from States. The SMO Study anticipates annual data collections through school year (SY) 2023-2024. This study is modular in nature, whereby some topics are included each year while others are added or removed as Food and Nutrition Service (FNS) priorities change. Because the research questions and associated survey topics change each year as FNS policy and program needs change, FNS usually seeks OMB approval for each annual data collection separately. The previous OMB approval covered data collection in SY 2021-2022 and SY 2022-2023 and included two State-level administrative data collections (covering fiscal years 2021 and 2022), two online surveys of State CN Directors (covering SY 2020-2021 and SY 2021-2022), and one online survey of SFA Directors (covering SY 2020-2021 and early 2021-2022). The upcoming data collection will again be used to meet States' statutory reporting requirements on the COVID-19 CN nationwide waivers under The Families First Coronavirus Response Act (FFCRA). This request is to update data collection topics and instruments for data collection occurring in SY 2023-2024 and focusing on SY 2022-2023 operations. The primary changes with this revision involve the Research Questions, by topic (Appendix B) and data collection instruments, which are included in Appendices D, E, and F.

A1. Circumstances Making the Collection of Information Necessary

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.

The U.S. Department of Agriculture's (USDA) FNS is 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. To inform current and future policy decisions and effectively oversee these programs, FNS requires information on how these programs are operating. Although FNS oversees these programs, State agencies administer them through agreements with SFAs and other local entities that implement the programs at the local level.

This information collection request is for a revision to the currently approved School Meals Operations Study: Evaluation of the School-based Child Nutrition Programs (SMO, OMB Control Number 0584-0607, expiration date 12/31/2024). This collection is necessary to provide up-to-date information about CN Program operations, including use of the COVID-19 CN nationwide waivers as required by the FFCRA. The annual data collected from this study allows FNS to describe and assess program operations, provide input for legislation and regulations on the CN Programs, and develop pertinent technical assistance (TA) and training for program staff at the State and local levels. This information is necessary for FNS to understand how recent and proposed legislation, regulations, policies, and initiatives change CN Program operations. Additionally, the data collection will meet States' statutory reporting requirements for the nationwide CN COVID-19 waiver approved by FNS

pursuant to section 2202 of the FFCRA (pub. L. 116-127; Appendix A), and used in SY 2022-2023.

This study will help FNS obtain:

1. General descriptive data on the characteristics of CN Programs to inform the budget process and answer questions about topics of current policy interest;
2. Data on program operations to identify potential topics for training and technical assistance for SFAs and State agencies responsible for administering the CN Programs;
3. Administrative data to identify program trends and predictors;
4. Information on the use and effectiveness of the CN COVID-19 waivers.

As indicated in Appendix B, Research Questions, data collection occurring in SY 2023-2024 and focusing on SY 2022-2023 operations will address research questions in five primary topic areas: (1) school and site participation, (2) child participation, (3) program operations, and (4) financial management, and (5) the nationwide CN COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2022-23.

Legal or Administrative Requirements

This study is necessary to implement 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 C). 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.”

In addition, some of the study’s research questions (Appendix B) correspond to the statutory SA reporting requirements for the nationwide CN COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2022-23. Section 2202(d) of the FFCRA (P.L. 116-127) requires any SA that elects to use a CN nationwide waiver to submit a report not later than 1 year after electing to use the waiver that, at a minimum, summarizes the use of such waiver and describes how the waiver resulted in improved services to Program participants (Appendix A).

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.

This study will collect disaggregated administrative data from State agencies and web survey data from State agencies and SFAs in order to better understand and describe CN Program operations and to meet the FFCRA-mandated reporting requirements for the nationwide CN COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2022-23.

How the information is to be used

The information collected through the SMO Study will be used to inform the budget process, describe and assess CN Program operations, provide input for legislation and regulations on the CN Programs, and develop pertinent TA and training for program staff at the State and SFA levels. In addition, the data collected will be used to fulfill the mandatory reporting requirements for the nationwide CN COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2022-23 approved by FNS under the FFCRA for SY 2022-2023 (FY 2023), just as the information previously collected through the SMO Study was used to meet States' statutory reporting requirements for the nationwide CN COVID-19 waivers in use between March and September 2020 (FY 2020), SY 2020-2021 (FY 2021), and SY 2021-2022 (FY 2022).

From whom the information will be collected

The information will be collected from a census of the 68 State agencies that oversee the NSLP, SBP, SFSP, and CACFP in the 50 States, District of Columbia, Guam, Puerto Rico, and U.S. Virgin Islands¹, and a nationally representative sample of 1,268 SFA Directors. Participation in the survey data collection is mandatory for State agencies and SFAs under the terms of the FFCRA waivers and the NSLA (as amended by Section 305 of HHFKA).

¹ There are a total of 68 unique State agencies included in the collection, which reflects an increase of 1 State agency from the SY 2021-2022 data collection. In some States, FNS CN Programs are administered by multiple agencies. Across the States and Territories included in the collection, there are 56 State agencies that administer the NSLP, SBP, or SSO; 53 State agencies that administer the SFSP; and 55 State agencies that administer the CACFP. Thus, the number of State agencies asked to complete the administrative data requests for the disaggregated FNS-10 (NSLP/SBP), FNS-418 (SFSP) and FNS-44 (CACFP) data will range from 53-56.

How the information will be collected

The SMO Study's data collection for the fourth collection (referred to in study materials as SMO IV) will occur in SY 2023-2024 and focus on SY 2022-2023 operations. Data collection will be comprised of the following parts (summarized in Tables A2.1):

(1) a web-based State Agency Child Nutrition Director Survey (Appendices D.1 and D.2), conducted at the beginning of SY 2023-2024 (fall 2023) to collect information on CN Program operations during SY 2022-2023 and meet the statutory reporting requirements of the CN COVID-19 waivers for SY 2022-2023 within the one-year timelines set by the FFCRA;

(2) an administrative data collection (Appendices E.1-E.3), conducted at the end of SY 2023-2024 (covering FY 2023); and

(3) a web-based SFA Director Survey (Appendices F.1 and F.2) conducted at the beginning of SY 2023-2024 (fall 2023) and covering local program operations during SY 2022-2023.

The surveys will consist of questions and response options relevant to the research questions (Appendix B), and will ask about CN Program operations, as well as use of the CN COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2022-23. The administrative data collection portion of the study will request disaggregated administrative data from State agencies that local program operators regularly report to State agencies for forms FNS-10 Report of School Program Operations, FNS-418 Report of the Summer Food Service Program for Children, and FNS-44 Report of the Child and Adult Care Food Program (jointly approved under OMB control number 0584-0594, Food Programs Reporting System (FPRS), expiration date 07/31/2023), but that are not otherwise reported to FNS in disaggregated form.

Table A2.1. Summary of SMO Data Collection Activities for SY 2023-2024

Instrument	Sample/ Respondents	Method of Collection	Length	Purpose	Data Collection Period
State Agency Child Nutrition Director Survey (Appendices D.1, D.2)	68 State agency Directors	Web survey	0.5 hours	To describe CN Program operations during SY 2022-2023 and use of the of the SY 2022-2023 Fiscal Action Waiver	Fall 2023
FNS-10 Administrative Data Request (Appendix E.1)	56 State agency Directors that oversee NSLP/SBP/SSO	Secure electronic transfer	6 hours	To provide meal claims data at the school or SFA level for the NSLP (including SSO) and SBP in fiscal year 2023	Spring 2024
FNS-418 Administrative Data Request (Appendix E.2)	53 State agency Directors that oversee SFSP	Secure electronic transfer	4 hours	To provide meal claims data at the site or sponsor level for the SFSP in fiscal year 2023	Spring 2024
FNS-44 Administrative Data Request (Appendix E.3)	55 State agency Directors that oversee CACFP	Secure electronic transfer	6 hours	To provide meal claims data at the outlet or institution level for the CACFP in fiscal year 2023	Spring 2024
School Food Authority Director Survey (Appendix F.1, F.2)	1,268 School Food Authority Directors	Web survey	0.5 hours	To describe SFA Program operations during SY 2022-2023	Fall 2023

Upon OMB approval, FNS headquarters will send a notification to FNS Regional Offices (Ros, Appendix G.1) to introduce the SMO Study data collection activities for SY 2023-2024 focusing on SY 2022-2023 operations, and ask FNS RO staff to inform State agencies about the upcoming data collections. To encourage State agencies to cooperate with information requests, all FNS ROs will send the Study Support Email from FNS Regional Offices to State Agencies (Appendix G.2) to alert the State CN Directors in their region about their important role in the SMO Study during SY 2023-2024. At the start of the SMO IV data collections, all State CN Directors will be sent the State Agency Advance Email (Appendix G.3) and Brochure (Appendix G.4) that explain the purpose of the study and describe study activities. The study team will follow the same procedures as previously approved to collect the disaggregated administrative data from States. The only difference is that the State agencies have already completed memoranda of understanding (MOUs) with the research team as part of the previous collection and will not be asked to do so again as part of the new collection. To request the administrative data, the study team will provide State CN Directors with the list of data elements that are being requested from the FNS-10, FNS-418, and FNS-44 Administrative Data Request forms (Appendices E.1-E.3), in spring 2024, and schedule and conduct phone calls using the Telephone Meeting Advance Email and Telephone Script (Appendix G.5). Because the SY 2023-2024 data request focusing on SY 2022-2023 operations will be generally the same as the most recent data collection, it is expected that State agencies will be familiar with the request. Using the FNS-10, FNS-418, and FNS-44 Administrative Data Request forms (Appendices E.1-E.3), the study team will request disaggregated FNS-10, FNS-418, and FNS-44 data for fiscal year 2023. Based on the data received through the previous SMO collections, it is expected that State agencies will have these data available at the school, site, or outlet levels, or at the SFA, sponsor, or institution levels. For each

administrative data collection instrument, the study team will initially request school-, site-, or outlet-level data from State agencies. If a State agency does not have these data available, the team will request SFA-, sponsor-, or institution-level data from that State agency. While the FNS-10, FNS-418, and FNS-44 Administrative Data Request instruments in Appendices E.1-E.3 include requests at both levels (school/site/outlet and SFA/sponsor/institution), each SA will only receive the request at the level for which they are able to provide the data (based on previous submissions for the SMO Study and what they indicate during the initial telephone meeting). The FNS-10, FNS-418, and FNS-44 Administrative Data Request instruments will link each data element to the corresponding item number on the FNS-10, FNS-418, and FNS-44 forms. The FNS-10, FNS-418, and FNS-44 variables assist in addressing the research questions related to school and site participation, as well as children's program participation.

In addition, the study team will distribute a web-based State Agency Child Nutrition Director Survey (Appendices D.1 and D.2) and a School Food Authority Director Survey (Appendices F.1 and F.2). These surveys each address research questions that cannot be answered using the FNS-10, FNS-418, and FNS-44 administrative data.

All 56 State CN Directors that oversee school meals will be asked to complete a web survey in fall 2023, covering CN Program operations during SY 2022-2023 and the COVID-19 CN nationwide waivers used in SY 2022-2023. The study team will follow the same procedures as outlined in the previously approved ICR for the State survey collections. For each survey, State agency CN Directors will be sent the State Agency Invitation Email (Appendix G.6) requesting that they complete the survey and providing instructions on how to access it. Reminder Emails (Appendix G.7) will be sent every 2-3 weeks to remind State agency CN Directors to complete their surveys. FNS expects each State to receive, on average, 2 reminder emails. If the web survey is not completed within 7 weeks after the

initial questionnaire is made available to the agency contact, trained interviewers will begin calling State agency CN Directors to remind them to complete their survey using the Telephone Reminder Script (Appendix G.8). We estimate calling eight of the 56 State agency CN Directors. Toward the end of the field period, all SA non-respondents will be sent the State Agency Last Chance Post Card (Appendix G.9). The data collection period for each State Child Nutrition Director Survey will span 10 weeks. Based on experience with the previously approved collection in SY 2021-2022, and because the collection is mandatory, FNS anticipates that 56 State agencies will ultimately respond.

The State Agency Advance Email (Appendix G.3) sent to all State agency CN Directors prior to the SMO IV collection in fall 2023 will notify the State agencies that the study team will soon contact selected SFAs for the SFA survey focused on SY 2022-2023 operations and will request that State agency CN Directors encourage cooperation by sending the Study Support Email from State Agencies to SFAs (Appendix G.10) to SFA Directors. All selected SFA Directors will then be sent the SFA Advance Letter (Appendix G.11) and Brochure (G.4) that explain the purpose of the study and describe study activities, followed by the SFA Invitation Email (Appendix G.12) requesting that they complete the survey and providing instructions on how to access it. Reminder Emails (Appendix G.7) will be sent every 2-3 weeks to remind SFA Directors to complete their surveys. FNS expects most SFAs to receive, on average, 2 reminder emails. If the web survey is not completed within 7 weeks after the initial questionnaire is received, trained interviewers will begin calling SFA Directors to remind them to complete their survey using the Telephone Reminder Script (Appendix G.8). We estimate calling 35 percent of SFA Directors. Toward the end of the field period, all SFA non-respondents will be sent the SFA Last Chance Post Card (Appendix G.13). The data collection period for the School Food Authority Director Survey will span 10 weeks. FNS anticipates that 1,012 SFAs (80% of sampled SFAs) will ultimately respond.

Frequency of data collection

This information request is for web-based surveys of State CN Directors and SFA Directors, collected in SY 2023-2024, focusing on SY 2022-2023 operations; and collection of FNS-10, FNS-418, and FNS-44 disaggregated administrative data from State agencies covering FY 2023.

Information shared with any other organizations inside or outside USDA or the government

As in most FNS data collection efforts, data files and documentation will be prepared for restricted-use (for researchers who agree to specific restrictions), and for public-use (with some masking of data to avoid identifying individual respondents). Some analyses may identify specific States in the final dissemination products that will be made publicly available in the research section of the USDA FNS website, <http://www.fns.usda.gov/ops/research-and-analysis>.

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 web surveys to State agencies and SFAs using the Confirmit 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. The web survey will be accessible using any device (tablet, smartphone, laptop, or desktop computer) and will be compatible with assistive technologies respondents might need to participate online.

Professional survey support specialists will be available during regular business hours to assist State CN Directors and SFA Directors completing a web survey. Respondents may save their progress, facilitating completion of the survey in more than one session. As needed, survey support specialists will be able to complete any modules that the respondent would like to complete over the phone using the respondent's unique web survey link. Based on experience conducting web surveys and supporting the completion of web surveys by phone, the study team expects that 56 State respondents and the expected 1,012 responding SFAs will complete the surveys on-line.

The FNS-10, FNS-418, and FNS-44 Administrative Data Requests will also be collected electronically using a secure transfer site. To encourage high response rates, the study team will inform State agencies that they may submit these data in whatever form is most convenient for them given the variety of systems and databases used by States nationwide. The team estimates that out of a total of 11,869 responses for this study, 89% will be electronic.

A4. Efforts to Identify Duplication and Use of Similar Information

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 approach used by this study, of requesting disaggregated FNS-10, FNS-418, and FNS-44 data, is intended specifically to reduce duplicative reporting. These data are not currently collected on any FNS administrative forms at the SFA, school, sponsor, site, institution, or outlet levels; however, SFAs, sponsors, and institutions regularly report these data to their States. States aggregate these data to report State-level meal claims information to FNS through the FNS-10, FNS-418, and FNS-44. Data of

this type have been collected under previous studies but not within the framework or timeline of the current research questions.

A5. Impacts 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 1,342 respondents for this collection, that 92 percent of our respondents are small entities (school districts with less than 50,000 students)², representing 1,236 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 revision to the SMO Study is a mandatory data collection for both State agencies and SFAs under the terms of the FFCRA and the NSLA. The CN Programs operate in each State and Territory and represent an annual investment of more than \$20 billion of Federal funds. To manage these programs effectively and to comply with statutory and regulatory requirements, FNS must collect and analyze data regarding program operations at the State and local levels. FNS also has many one-time information needs, including those to address current policy issues associated with these programs, which cannot be answered with existing program data. This includes congressionally-mandated information on the use and effectiveness of the nationwide CN COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School

² According to OMB Form 83-I, “a small government entity may be... a jurisdiction which is a... government of a city, county, town, township, school district, or special district with a population of less than 50,000.” Nearly all SFAs qualify as small SFAs under this definition.

Year 2022-23. This information will be collected during SY 2023-2024 through one SFA survey and one State agency survey covering SY 2022-2023 operations, as well as one administrative data collection (covering FY 2023). The State-level survey will be used to satisfy States' statutory reporting requirements under the FFCRA. Collecting these data less frequently would make it harder for States to meet their statutory reporting requirements and would not allow FNS to properly monitor program funding, statutory and regulatory compliance, and program trends, thus delaying the discussion, formulation, and implementation of suitable program policies, training, and technical assistance.

A7. Special Circumstances Relating to the Guideline of 1320.5(D)(2)

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.**

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

A8. Comments in Response to the *Federal Register* Notice and Efforts to Consult with Persons Outside the Agency

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.

Federal Register notice

A notice of this study was published in the *Federal Register* on February 1, 2023, Volume 88, Number 21, pages 6697-6700. The public comment period ended on April 3, 2023. A total of seven comments were received, all of which were unique (Appendices H.1-H.7). FNS responded to five comments pertaining to components of the study design (Appendices H.8-H.12). The remaining two comments were directed towards FNS programs, not toward this study.

Expert Consultation

Three State CN directors were consulted about the burden, clarity of instructions, and content of the State surveys, and six SFA directors pre-tested the SFA survey and provided feedback. With their permission, their names and contact information are listed in Table A8.1. The results of the pretest are presented in Appendix M. Overall, reviewers of the State CN Director Survey found the survey to be generally easy to understand, and they appreciated that the format and questions are similar to the first SMO SA survey, as they expect that to ease survey response. Reviewers also indicated that the changes made to simplify response options and clarify instructions should also ease survey response. Reviewers

of the SFA Director Survey found the survey to be straightforward and generally easy to complete. They provided feedback on the wording of some questions and offered suggestions for additional response options. Four of the six reviewers were able to complete the survey within the target burden estimate of 30 minutes. Adjustments made to the collection in response to expert comments are summarized in Part B, Question 4 and in Appendix M.

Table A8.1. Expert Consultant List

Name	Title	Affiliation	Phone	Year of consultation
Adriane Ackroyd	Assistant Director	Child Nutrition, Maine Department of Education	207-592-1722	2023
Jessica Sharkus	Director	School Nutrition Team Director, Wisconsin Department Public Instruction	608-267-9121	2023
Cara Alexander	Deputy Associate Superintendent	Arizona Department of Education	602-542-8711	2023
Lindsay Aguilar	Director	Tucson Unified School District (AZ)	520-225-4700	2023
Caitlin Harrison	Food Service Director	Elmbrook Unified School District (WI)	262-781-3030 x11148	2023
Cody Williams	Director	Novato Unified School District (CA)	415-493-4260	2023
Michael Gasper	Nutrition Services Director	Holmen Area School District (WI)	608-526-6610 x1324	2023
Patti Bilbrey	Nutrition Services Director	Scottsdale Unified School District (AZ)	480-484-6208	2023
Sandra Hodgins	Food Services Director	Brewer Unified School District (ME)	207-989-8644	2023

FNS consulted with Doug Kilburg from the National Agricultural Statistics Service for expert consultation on the study design and methodology at the beginning of the SMO Study. National Agricultural Statistics Service Comments and FNS Responses are in Appendix I.

A9. Explanation of Any Payments or Gifts to Respondents

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

Respondents will not receive any incentive payments or gifts.

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 study team complies with the Privacy Act of 1974. No confidential information is associated with this collection of information. FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* (volume 56, pp. 19078–19080) on April 25, 1991. This notice discusses the terms of protections that will be provided to respondents.

To be responsive to FNS requirements regarding respondent protections, study team will sign the Confidentiality Pledge (Appendix J) and participate in annual security awareness training. Access to the data will be limited to members of the study team working directly on the study or with oversight responsibilities, except as otherwise required by law.

The study team will ensure that data are secure by providing a secure transfer site for administrative data from States and storing all study data in a restricted access project directory on a password-protected local area network. State agencies will be assured that the information they provide will not be released in a way that compromises privacy or data security.

The web surveys will be developed in Conformat, a computer-assisted survey software package developed by the company of the same name, and all data will be stored securely within this system. Through Conformat, unique user credentials (ID and Password) are created for each survey participant. Each participant will be assigned to a copy of the instrument. Access to the instrument is provided via a unique URL sent to the participant's email account. The URL will contain an embedded hashed ID and Password for the participant. When the participant clicks on the URL, they will be automatically directed to the website and authenticated into the instrument. All data captured through Conformat, will be stored in a study-specific folder that is encrypted with AES 256-bit encryption on the Conformat

server. All access to this data is controlled by Active Directory groups on Mathematica's Domain Network. Each study team member must have valid credentials to access the Conformat data stored in restricted access folders. While none are expected, any hard-copy documents submitted will be physically secured in locked storage cabinets and shredded at the close of the study.

Personally identifiable information (PII) will not be used to retrieve survey records or data. Neither the survey nor the other data collection materials in this collection require a Privacy Act Statement. Contact information will be stored with the other study data in a restricted access project directory on a password-protected local area network and will not be shared outside the study team.

The FNS Privacy Officer reviewed this ICR for privacy compliance on May 15, 2023, and had no privacy concerns.

A11. Justification for Sensitive Questions

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.

This information collection does not include any questions of a sensitive nature. The FNS Privacy Officer reviewed this ICR for privacy compliance on May 15, 2023, and had no privacy concerns.

A12. Estimates of Hour Burden Including Annualized Hourly Costs

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 revision of a currently approved collection. With this submission, there are 1,342 respondents (1,088 respondents and 254 non-respondents), 11,869 responses (7,997 respondents and 3,872 non-respondents), and 2,030.50 burden hours (1,799.11 for respondents and 231.39 for non-respondents). The average number of responses per respondent is 7.35 and the average number of responses per non-respondent is 15.24. Across all participants in the collection, the average number of responses is 11.30. Table A12.1, Estimated Annualized Burden and Appendix K, shows 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, outside consultants, 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 \$47,607.85 (\$48.97/hr. x 972.18 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 \$41,634.37 ($\$48.66/\text{hr.} \times 855.62$ 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 \$9,863.09 ($\$48.66/\text{hour} \times 202.69$ hours). Including an additional \$32,704.75 to account for fully loaded wage rates ($\$99,105.31 \times 0.33$), the estimated annualized total cost to respondents associated with this collection is \$131,810.07.³

³ These calculations have been adjusted to reflect the totals in the burden table (Table A12.1 and Appendix K). Minor differences between the amounts displayed and the results of the calculations shown are due to rounding.

Table A12.1 Estimated Annualized Burden

Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-Responsive					All	All	All
				Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Total Annual hour burden	Hourly Wage Rate	Total annualized cost of respondent burden
State CN Directors	Web survey and administrative data pre-test and debrief	M	3	3	1	3	1.00	3.00	0	0	0	0.00	0.00	3.00	\$48.97	\$146.91
	Study support email from FNS Regional Offices to State Agencies	G.2	68	68	1	68	0.05	3.40	0	0	0	0.00	0.00	3.40	\$48.97	\$166.50
	Study support email from State Agencies to SFAs	G.10	56	56	1	56	0.33	18.48	0	0	0	0.00	0.00	18.48	\$48.97	\$904.97
	Advance letter	G.3	68	68	1	68	0.05	3.40	0	0	0	0.00	0.00	3.40	\$48.97	\$166.50
	Advance email	G.5	68	68	1	68	0.05	3.40	0	0	0	0.00	0.00	3.40	\$48.97	\$166.50
	Initial telephone meeting agenda	G.5	68	68	1	68	0.33	22.44	0	0	0	0.00	0.00	22.44	\$48.97	\$1,098.89
	FNS-10 Administrative data request for FY 2023	E.1	56	56	1	56	6.00	336.00	0	0	0	0.00	0.00	336.00	\$48.97	\$16,453.92
	FNS-418 Administrative data request for FY 2023	E.2	53	53	1	53	4.00	212.00	0	0	0	0.00	0.00	212.00	\$48.97	\$10,381.64
	FNS-44 Administrative data request for FY 2023	E.3	55	55	1	55	6.00	330.00	0	0	0	0.00	0.00	330.00	\$48.97	\$16,160.10
	Web survey	D.1, D.2	56	56	1	56	0.50	28.00	0	0	0	0.00	0.00	28.00	\$48.97	\$1,371.16
	Brochure	G.4	56	56	1	56	0.05	2.80	0	0	0	0.00	0.00	2.80	\$48.97	\$137.12
	Invitation email	G.6	56	28	1	28	0.05	1.40	28	1	28	0.05	1.40	2.80	\$48.97	\$137.12
	Reminder email	G.7	28	20	4	80	0.05	4.00	8	4	32	0.05	1.60	5.60	\$48.97	\$274.23
	Telephone reminder script	G.8	8	4	2	8	0.08	0.66	4	2	8	0.00	0.00	0.66	\$48.97	\$32.52
	Last chance post card	G.9	4	4	1	4	0.05	0.20	0	0	0	0.00	0.00	0.20	\$48.97	\$9.79
SFA	Web survey pre-test &	M	6	6	1	6	1.00	6.00	0	0	0	0.00	0.00	6.00	\$48.66	\$291.96

Part A School meals operations study

Table 12.1 (continued)

	Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-Responsive					All	All	All
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Total Annual hour burden	Hourly Wage Rate	Total annualized cost of respondent burden
S t a t e / L o c a l G o v e r n m e n t	Directors	debrief															
		Study support email from State Agencies to SFAs	G.10	1,044	1,044	1	1044	0.05	52.20	0	0	0	0.00	0.00	52.20	\$48.66	\$2,540.05
		Advance email	G.11	1,044	836	1	836	0.05	41.80	208	1	208	0.05	10.40	52.20	\$48.66	\$2,540.05
		Web survey	F.1, F.2	1,044	836	1	836	0.50	418.00	208	1	208	0.05	10.40	428.40	\$48.66	\$20,845.94
		Brochure	G.4	1,044	836	1	836	0.05	41.80	208	1	208	0.05	10.40	52.20	\$48.66	\$2,540.05
		Invitation email	G.12	1,044	263	1	263	0.05	13.15	781	1	781	0.05	39.05	52.20	\$48.66	\$2,540.05
		Reminder email	G.7	781	508	4	2,032	0.05	101.60	273	4	1,092	0.05	54.60	156.20	\$48.66	\$7,600.69
		Telephone reminder script	G.8	273	55	2	110	0.08	9.13	218	2	436	0.08	36.19	45.32	\$48.66	\$2,205.17
		Last chance post card	G.13	218	28	1	28	0.05	1.40	190	1	190	0.05	9.50	10.90	\$48.66	\$530.39
State and Local Government Subtotal				1,118	910	7.38	6,718	0.25	1654.26	208	15.34	3,191	0.05	173.54	1827.80		\$89,242.22
P r i v a t e , N o t - F o r - P r o f i t	SFA Directors	Study support email from State Agencies to SFAs	G.10	224	224	1	224	0.05	11.20	0	0	0	0.00	0.00	11.20	\$48.66	\$544.99
		Advance email	G.11	224	178	1	178	0.05	8.90	46	1	46	0.05	2.30	11.20	\$48.66	\$544.99
		Web survey	F.1, F.2	224	178	1	178	0.50	89.00	46	1	46	0.50	23.00	112.00	\$48.66	\$5,449.92
		Brochure	G.4	224	178	1	178	0.05	8.90	46	1	46	0.05	2.30	11.20	\$48.66	\$544.99
		Invitation email	G.12	224	56	1	56	0.05	2.80	168	1	168	0.05	8.40	11.20	\$48.66	\$544.99
		Reminder email	G.7	168	109	4	436	0.05	21.80	59	4	236	0.05	11.80	33.60	\$48.66	\$1,634.98
		Telephone reminder script	G.8	59	12	2	24	0.08	1.99	47	2	94	0.08	7.80	9.79	\$48.66	\$476.58
		Last chance post card	G.13	50	5	1	5	0.05	0.25	45	1	45	0.05	2.25	2.50	\$48.66	\$121.65
Private, Not-For-Profit Businesses Subtotal				224	178	7.19	1,279	0.11	144.84	46	14.80	681	0.08	57.85	202.69		\$9,863.09
TOTAL				1,342	1,088	7.35	7,997	0.22	1799.11	254	15.24	3,872	0.06	231.39	2,030.50		\$99,105.31
.33% to Account for Fully Loaded Wage Rate																	\$32,704.75

Part A School meals operations study

Table 12.1 (continued)

	Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-Responsive					All	All	All
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Total Annual hour burden	Hourly Wage Rate	Total annualized cost of respondent burden
TOTAL REPORTING BURDEN (Fully Loaded)																	\$131,810.07

Notes:

D4 & E4 - State level pretest respondents are included in the overall State sample of 56 so are not considered unique respondents for the purpose of calculating total sample size or total number of respondents.

E22 - Assumes an 80% survey response rate

E24 - Assumes an initial response rate of 25%, with the initial nonrespondents receiving reminder emails

J28 - Includes only those expected to never respond

D15 &16, D24 & 25 - Telephone reminders and last chance post cards will be deployed simultaneously to the same remaining sample in the latter part of the survey field period. Each of the instruments assumes the same number of respondents and non-respondents.

A13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

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. 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 \$721,447.88. The largest cost to the Federal Government is to pay a contractor \$2,415,204 over a period of 42 months (September 2020 to March 2024) to conduct the study and deliver data files and reports. This represents an average annualized cost of \$690,058.29 including labor and other direct and indirect costs. The annualized cost of this information collection also assumes a total of 400 hours annually of Federal employee time: for a GS-12, Step 6 at \$52.66 per hour for a total of \$21,064. In addition, we assume 40 hours annually for the Branch Chief, at GS-14, Step 1, at \$63.43 per hour for a total annual cost of \$2,537.20. Adding in \$7,788.39 to account for fully loaded wages (\$23,601.20 x 0.33), total Federal employee costs per year are thus estimated at \$31,389.59. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2023 for the Washington, DC locality (Office of Personnel Management. 2023. Salary table 2023-GS. Retrieved from

[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf)

[DCB_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf).

A15. Explanation for Program Changes or Adjustments

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 the approved collection for the SMO Study (OMB Control No. 0584-0607 School Meals Operations Study: Evaluation of the School-based Child Nutrition Programs, expiration date: 12/31/2024). This information collection is currently approved with 4,116 burden hours and 10,015 responses to collect information during two school years (SY 2021-2022 and SY 2022-2023), including two state-level administrative data collections (Appendices E.1, E.2, and E.3 in the previously approved ICR), two online surveys of State CN directors (Appendices D.1, D.2, D.3 and D.4 in the previously approved ICR), and one online survey of SFA directors (Appendices F.1 and F.2 in the previously approved ICR). FNS has revised this study to collect data during a single school year (SY 2023-2024), which will include one State-level administrative data collection (Appendices E.1, E.2, and E.3 in the revised ICR), one online survey of State CN Directors (Appendices D.1 and D.2 in the revised ICR), and one online survey of SFA Directors (Appendices F.1 and F.2 in the revised ICR).

Information from this collection will again be used to meet States' statutory reporting requirements on the COVID-19 CN nationwide waivers under FFCRA and provide information about CN Program operations to inform current and future policy decisions and effectively oversee the CN Programs. In the previously approved ICR, the State Child Nutrition Director Surveys each had a burden of 6 hours because each survey collected information about a school year when States used many COVID-19 nationwide waivers to serve meals to children (i.e., SY 2020-2021 and SY 2021-2022), and States were required by law to report on their use. The revised ICR will collect information about a school year when States were recovering from pandemic operations and used far fewer COVID-19 nationwide waivers (i.e., SY 2022-2023), resulting in far less mandated reporting. Based on feedback provided by State agencies and SFAs during the survey pretests for this data collection, FNS is decreasing the

estimate of the State Child Nutrition Director survey burden from 6 hours to 30 minutes and the SFA Director survey burden from one hour to 30 minutes (Appendices D.1 and F.1, respectively). The number of reminder emails for the SFA Director Survey has increased from two emails to four emails, to encourage response rates. FNS estimates that this information collection will have 2,030.50 burden hours and 11,869 responses, which is 2,085.5 fewer burden hours and 1,854 more responses than previously approved.

A16. Plans for Tabulations and Publication and Project Time Schedule

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

Study schedule. The planned schedule for the activities in the study is as follows:

Table A16.1 Data collection schedule

Recruitment of States and SFAs	1 week post OMB approval
State Agency Survey Data Collections	October 2023 – December 2023, or 2 weeks post OMB approval
SFA Director Survey Data Collection	October 2023 – December 2023, or 2 weeks post OMB approval
Administrative Data Collection	March 2024 – May 2024
Prepare Data Files	5 months following the start of data collections
Analyze Data	8 months following the start of data collections
Publication	13 months following the start of data collections

Analysis

The analysis will address the research questions identified in Appendix B. The primary mode of analysis will be descriptive, including univariate statistics (means, medians, and frequencies) and cross tabulations. Analyses of administrative data will be at the State, SFA, school, sponsor, site, institution and outlet levels, if administrative data at the school, site, and outlet levels are available from State agencies. Analyses of the State CN Director survey will be at the State agency and regional levels, as applicable. All analyses of data from the SFA survey will be at the SFA level and incorporate analysis

weights that account for selection probabilities and nonresponse patterns and will be calibrated to benchmark counts, such as those reported in the FNS-742 School Food Authority Verification Collection Report (OMB number 0584-0594, Food Programs Reporting System (FPRS), expiration date 07/31/2023) (Appendix L). For selected outcomes, the study team will test differences between key subgroups for statistical significance using two-tailed t-tests.

Plans for publication

FNS will share study findings through potential products such as a summary of findings, data visualizations, or study briefings. Final dissemination products may be available to the public on the FNS research website.

A17. Display of Expiration Date for OMB Approval

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. Exception to the Certification Statement Identified in Item 19 of Form OMB 83-1

Explain each exception to the certification statement identified in Item 19 of the OMB 83-1 “Certification for Paperwork Reduction Act.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-1.