

Supporting Statement for
USDA Professional Standards Training Tracker Tool (PSTTT)

OMB No.: 0584-0626

Project Officer: Kaushalya Heendeniya

U.S. Department of Agriculture

Child Nutrition Programs, FNS

Braddock Metro Center II

1320 Braddock Place

Alexandria, VA 22314

(703) 305-0037

Kaushalya.Heendeniya1@usda.gov

Table of Contents

Supporting Statement – Part A.....	3
1. Circumstances That Make The Collection Of Information Necessary.	3
2. Purpose And Use Of The Information	5
3. Use Of Information Technology And Burden Reduction.....	9
4. Efforts To Identify Duplication.	10
5. Impacts On Small Businesses Or Other Small Entities	10
6. Describe the Consequences Of Collecting the Information Less Frequently.....	11
7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....	12
8. Comments to the Federal Register Notice And Efforts For Consultation.....	14
9. Explain Any Decision To Provide Any Payment Or Gift To Respondents.....	22
10. Assurances Of Confidentiality Provided To Respondents	22
11. Justification For Any Questions Of A Sensitive Nature.....	24
12. Estimates Of The Hour Burden Of The Collection Of Information.	24
13. Estimates Of Other Total Annual Cost Burden	26
14. Provide Estimates Of Annualized Cost To The Federal Government.....	27
15. Explanation of Program Changes Or Adjustments	28
16. Plans For Tabulation, And Publication And Project Time Schedule.....	28
17. Displaying The OMB Approval Of Expiration Date	28
18. Exceptions To The Certification Statement Identified In Item 19	29

Appendixes

APPENDIX A- The Healthy Hunger Free Kids Act of 2010 (Section 306)

APPENDIX B - USDA Professional Standards Training Tracker Tool Screenshots

APPENDIX C – Professional Standards Training Tracker Tool (PSTTT) Training Videos and Transcripts

APPENDIX D – USDA Professional Standards Training Tracker Tool User Guide

APPENDIX E – Jean Public Comment to 85 FR 9724

APPENDIX F – SNA Comment to 85 FR 9724

APPENDIX G – FNS responses to Final Comments to 85 FR 9724 pps 9724-9725 SNA comment

APPENDIX H – Feedback Submitted by USDA Professional Standards Training Tracker Tool Users

APPENDIX I - Professional Standards Training Tracker Tool (PSTTT) Privacy Documentation Checklist

APPENDIX J – E-Authentication Guidance for Federal Agencies OMB M04-04

APPENDIX K – Professional Standards Training Tracker Tool Burden Estimates Table

Supporting Statement – Part A

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.

The USDA Professional Standards Training Tracker Tool (PSTTT) was developed by the Nutrition, Education, Training and Technical Assistance Division of the Food and Nutrition Service (FNS) for all school nutrition professionals working for the school meal programs, which includes the National School Lunch Program (NSLP), School Breakfast Program (SBP), NSLP Afterschool Snack Service, and preschools operating under the NSLP and SBP. The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals (See APPENDIX A). To meet the training requirements and assist in keeping track of training and training courses, our web-based application tool with a SQL-server database is available to local educational agencies and school food authorities (SFAs) through the FNS public website, with a login authentication. These resources facilitate compliance with HHFKA requirements and are provided at no cost to the state, district, or school nutrition professionals.

2. 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 Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See APPENDIX A). The rule, published March 2, 2015, requires a minimum amount of annual training hours for all State agency (SA) personnel (state directors of school nutrition programs and state director of distributing agencies) and school nutrition professionals (school nutrition program directors, managers, and staff). All school and SA nutrition professionals are responsible for meeting their own training requirements. A manager can monitor to ensure his/her employees are meeting their requirements. The rule requires each SFA to maintain records that annually document compliance with the professional standard requirements for all school nutrition program employees. Documentation must be adequate to support to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards. For their ease, SFA and SAs have the option to use a tracking tool (such as USDA's PSTTT) to assist in keeping track of the training activities. With a tool such as PSTTT, a SFA or SA may generate annual records for verification of training completed. Documentation such as copies of the training agenda, sign-up sheets, and other paper documents are also acceptable. Each SFA decides how to maintain the records to document training completion. The burden for State directors and SFAs to maintain records to demonstrate compliance with the professional standards is included on the ICR - 7 CFR Part 210 National School Lunch

Program and Administrative Reviews in the School Nutrition Programs (OMB
CONTROL NUMBER 0584-0006)

Required training topic areas will vary according to position and job requirements. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals. FNS' web-based application is available to local educational agencies and school food authorities through the FNS public website. See APPENDIX B for sample screenshots of the PSTTT.

Using the PSTTT supports State and school nutrition professionals to keep track of their training hours. By tracking their success, employees are motivated to build their skills and empower staff to lead and efficiently operate school nutrition programs. SFA-level compliance with the professional standards is included as a part of the Administrative Review (AR) conducted by State agencies every three years. The ARs are done on the current school year but may look back on the previous year. The AR is a comprehensive off-site and on-site evaluation of all SFAs participating in the National School Lunch Program, School Breakfast Programs and other Federal school nutrition programs. As a feature of the PSTTT, generated reports can be easily viewed during the AR by State agency personnel to verify compliance with the required annual training hours. While the requirement for the annual training hours is mandatory, using the PSTTT to track training is voluntary. Users have the discretion on how frequently to record their trainings. They can enter their training on occasion, quarterly, weekly, monthly, and/or annually to log in training to meet the required hours for their position. State and local school district

nutrition professionals can also use other means to track their training. The PSTTT is used by an audience (school nutrition professionals and state agency personnel) that varies widely in technical ability and knowledge, and the web application is designed to be intuitive to use and accessible to all local school districts. In addition, it is imperative that there is a mobile friendly version of this PSTTT application to ensure easy usage and accessibility across mobile devices. This allows users to enter their training information at their pace either directly after a training has been completed or at a later time and date. Training videos (See APPENDIX C), along with a user guide (See APPENDIX D) on using the PSTTT is available on the PSTTT web site. The training videos and user guide are meant to equip the users with the tools and knowledge needed to assist in using the PSTTT.

Create Profile

The user can create a user profile with the following information: school district/address; school name/address; school nutrition professional – contact information/email address; title of school nutrition professional or role in school nutrition program; and hiring date. The user will be logging in the following training information: key area; training topic; learning objective; training title; training hours/minutes; date of training; and provider or organization offering training, including state, local, or national.

The PSTTT has multiple time saving features available that are helpful for users. This tool provides a list of trainings in the database that users can select and the course information and training hours auto-populate. Users can also enter multiple learning

objectives or training topics for one-single training. Managers can enter trainings for multiple employees at the same time. This tool shows managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement. The tool also provides other great features, such as: running reports, printing certificate of completion once annual training requirements are met, editing files, deactivating employee profiles of staff no longer at the organization, auto-populating school contact information (available through school database where data is imported from the National Center for Education Statistics (<https://nces.ed.gov/ccd/elsi/tableGenerator.aspx>)), bi-annual email reminder notification to complete remaining training hours to meet annual requirements, and ability to export and save results in multiple file formats, including PDF (.pdf), Excel and Word or higher (.docx). It has a user-centered, simple, intuitive interface, making this tool user-friendly and easy to navigate.

Information Logged

The user logs the following training information: key area, training topic, learning objective, training titles, training hours/minutes, date of training, and training provider. Additionally, users can add certificates to logged trainings or log certifications separate from trainings. Users input the certification name, completion date, and expiration date. The PSTTT will send a reminder email to the user 30 and 90 days prior to the expiration date.

Reports

Summary and detailed reports can be generated by the user and display completed hours of training to be used during the AR. The reports can be a summary of one or more employees at a time by providing quick glance of their status with the annual training requirement. Additionally, the detailed report provides information on individuals or all staff pertaining to training hours that are grouped by training topics and objectives, certificates of completion, date range, etc.

This is an extension, without change, of a currently approved information collection.

There have been no changes in the collection requirements or the burden since the last submission.

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.

Data collection is 100 percent electronic. The tool is available through the FNS public website. Users create a profile using the following information: school district/address, school name/address, individual name, email address, title of their position, and hiring date. Managers are able to create user profiles for their own employees. In addition, there is a mobile friendly version of this PSTTT application to ensure easy usage and

accessibility across mobile devices. The application is compatible with all mobile operating systems (iOS, Android, and Windows).

4. 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.

There is no similar information collection. Every effort has been made to avoid duplication. FNS solely administers the free USDA PSTTT for the purpose of tracking professional standards training required under Administrative Reviews.

5. 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. No small entities are impacted by this collection of information. The PSTTT has multiple time-saving features that are helpful for users. This tool provides a list of trainings in the database that users can select, and the course information and training hours auto-populate. Users are also able to enter multiple learning objectives or training topics for one single training. Managers can enter trainings for multiple employees at the same time. This tool shows managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement.

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.

This is an ongoing, voluntary information collection that is needed in order to meet requirements outlined in the Healthy Hunger-Free Kids Act of 2010 regarding Professional Standards. The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See APPENDIX A). Not meeting the yearly training requirements will put the particular school or district out of compliance. The organizations are given a period of time for corrective actions. Using the PSTTT is just one of the tools available for tracking required training and is strictly voluntary. School nutrition professionals can decide which tool or method of tracking training requirements fits best. They also have the option to decide how frequently they will record the trainings (on occasion, quarterly, weekly, monthly, and/or annually).

As part of the Professional Standards requirements for school nutrition professionals and State agency personnel, State reviewers have instant access to the PSTTT to obtain information for the AR. By school nutrition professionals entering their training information, State reviewers can gather information for the AR before going onsite to the SFA. This time-saving feature reduces the time the reviewer would have to spend at the facility. It also reduces the review time by having all the information in one location and not having to review multiple sheets of paper. Additionally, school foodservice directors

or authorized personnel may regularly peruse their staff accounts to ensure trainings are recorded regularly. The previous version of the PSTTT was a downloadable application with limited capabilities.

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;**

Users can decide when and how frequently they want to record the trainings. The Professional Standards regulations require school nutrition professionals to have a record to show the completed hours by the end of the school year. Since it is up to the users to track their completed training, they can choose to track their trainings as they are taken on a weekly reporting basis, monthly, when they gather information for performance reviews, etc. Since this is the case, FNS expects that the information will be recorded on a weekly, monthly, quarterly, or annual basis or as it occurs on occasion. Administrative reviews occur every three years and school nutrition professionals are required to have their yearly records showing completed training requirements ready to submit every three years for the administrative review.

- **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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publications 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.

A notice was published in the Federal Register on May 10, 2023, Volume 88, pages 30074-30075. The comment period ended on July 10, 2023. FNS received two comments in response to the notice, but only one was applicable to the USDA PSTTT. One comment from Jean Public (See APPENDIX E), did not address the Notice, but rather stated the spelling of a contact on the notice was incorrect; the spelling on the notice was verified to be accurate. Thus, a formal response was not sent.

FNS received a comment on July 11, 2023, from the School Nutrition Association (SNA) (see APPENDIX F). The response to the comment is included in this package (see APPENDIX G). SNA, on behalf of its membership, indicated that the USDA PSTTT is cumbersome due to 1) districts was re-enter information already in the existing database and 2) the eAuthentication login is inconvenient. SNA suggested that the capacity to import data from a spreadsheet would be more convenient. FNS replied to SNA informing the Association that the ability to bulk upload information via .csv template is an available feature. USDA eAuthentication account provides secure, convenient access to multiple USDA applications using a user ID and password associated with a unique email address.

FNS sought feedback from state representatives included are:

1) Sylvia Jenson

Alpine School District

sjenson@alpinedistrict.org

2) Paul LeBlanc

Houston Independent School District

Paul.LeBlanc@houstonisd.org

3) Katrina Arrington

Baltimore City Public Schools

KCArrington@bcps.k12.md.us

FNS received suggestions from representatives to enhance features to include director role option to manage multiple school districts, school location display in reports, upload of training history, bulk upload training for multiple employees, a excluding deactivated employees in reports, and displaying employee name as “First Last.” We have added all these features (Also see Appendix H). No comments were received about the burden associated with this collection.

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

No payment or gift will be provided to respondents.

10. 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. The Privacy Impact Assessment (PIA) and the Privacy Threshold Analysis (PTA) were prepared, submitted to, and approved by FNS Privacy Officer (See APPENDIX I, Privacy Document Checklist). Privacy safeguards can be found in the PIA under Section 8.0.

Employees can create their user profiles after receiving confirmation from USDA’s eAuthentication. The E-Authentication Guidance for Federal Agencies OMB M04-04 (See APPENDIX J requires that each and every transaction accomplished by the public in an IT system be evaluated to determine if the level of authentication is sufficient for the transaction (business) performed (E-Authentication Risk Assessment). The authentication

focuses on confirming a person's identity, based on the reliability of his or her credential. Authorization focuses on identifying the person's user permissions. M04-04 is concerned with authentication (See APPENDIX J). The FNS Privacy Officer in place at the time that the PSTTT was initially being developed in 2016 advised that a System of Records Notice (SORN) was not needed for PSTTT because it did not collect PII or retrieve information by personal identifiers itself. The users' first and last name and email addresses are collected through their eAuthentication account and are automatically populated into PSTTT. FNS does not use this personal information. A SORN covering eAuthentication, titled USDA.OCIO-2 eAuthentication Service was published in the Federal Register on March 14, 2012 (Vol. 77, pp 15024-15026) providing overall security for accessing FNS systems. While the ICR does request personally identifiable information, it does not include a form that requires a Privacy Act Statement.

Some school nutrition professionals may not have access to computers. Therefore, managers can create accounts for employees who are unable to create their own. Managers have access to log in training hours to their designated employees. Only managers can search and add his/her employees (who have already created a profile) to their employee roster. A school manager can only add an employee that is in the same school/district and State agency managers can only add a user that is in their state. The federal contractor employees working on the PSTTT must adhere to the contract in place for developing and ongoing maintenance and enhancements and adhere to procedures and policies in place for protecting the information that they see during these activities. The contract specifically states that the use of any information that is subject to the Privacy

Act will be utilized in full accordance with all rules of conduct as applicable to Privacy Act Information.

Due to the recent Department transition from eAuthentication to Login.gov, the USDA PSTTT will make adjustments to comply with Login.gov security measures when the transition has been completed.

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.

This information collection does not involve questions of a sensitive nature.

12. 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 renewal of a currently approved information collection. This collection has 10,006 respondents, 70,042 responses, and 17,090 burden hours.

Estimated Number of Respondents: The total estimated number of respondents is 10,006. This includes 6 State agency personnel and 10,000 school nutrition professionals who voluntarily choose to utilize this tracking tool. All respondents are offered a 60-minute training refresher webinar to highlight enhancements.

Estimated Number of Responses per Respondent: Total estimated number of responses per respondent across the entire collection is 7. The estimated number of responses per respondent for the tracking tool is five. The tracking tool users are first required to create their user profile, which will be saved for future use. It is estimated that the user will be updating and managing their records on a quarterly basis. The estimated number of responses per respondent for the training webinar and the recording of trainings is one.

Estimated Total Annual Responses: 70,042

Estimated Time per Response: The estimated time per response across the entire collection is approximately 14 minutes (0.24 hours). For the training tracker tool, the estimated time of response varies from five to ten minutes depending on familiarity of the tool and the amount of reports created with an average estimated time of 7.5 minutes (0.125 hours) for all participants. The training refresher webinar of 60 minutes (1 hour) is available for all participants. Participants can record trainings into the tracking tool, which is estimated to take 5 minutes (0.083 hours) to complete.

Estimated Total Annual Burden on Respondents: 17,090.25 hours (rounded to 17,090 hours).

See APPENDIX K for estimated total annual burden for each type of respondent.

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

The estimate of respondent cost for PSTTT is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational Employment and Wage Estimate (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage is \$14.77 for elementary and secondary food preparation workers (Occupational Group 35-2021) and \$30.41 for State education occupations (Occupational Group 25-0000). With approximately 80% food preparation users and 20% State agency users, the

combined wage for this entire group of users is approximately \$17.90 per hour. The estimated annualized cost to respondents is \$406,867.59 (including fringe benefit cost) calculated as follows:

TOTAL COST TO THE PUBLIC =

$17,090.25 \times \$17.90 = \$305,915.48$

$\$294,465 \times 0.33 = \$97,173.45$ (fringe benefit rate)

$\$305,915.48$ (initial cost) + $\$97,173.45$ (fringe benefit rate) = **\$403,088.93 (total cost)**

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 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.

14. 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 estimated annualized cost to the Federal government is approximately \$966,384.40 (including fringe benefit). The cost estimate for three federal employees is based on a 40% effort (or 1.2 full-time equivalents) at the GS-13 Step 2 average salary in the Washington, DC locality per OPM’s 2023 pay charts. Federal employees are the subject matter experts on Professional Standards, FNS programs, and customer expectations, whereas contract staff are responsible for managing the technical aspects of the tool, such as developing, launching, training, and maintaining it with federal employee oversight. The decrease cost with this renewal is due to lower pay grades Federal staff.

This estimate is based on the following:

Annual server hosting and maintenance cost:	\$485,000.00
Three Federal employees* (\$115,749 x 1.2)	\$138,898.80
Contract Staff** (Operations, maintenance & enhancement of tool)	\$296,649.00

Subtotal: \$920,547.80 (initial cost)

\$138,898.80 X 0.33 = \$45,836.60 (fringe benefit rate calculated from federal employee costs)

\$920,547.80 (initial cost) + \$45,836.60 (fringe benefit rate) = \$966,384.40 (total cost)

Total: \$966,384.40

* 1.2 Full-Time Equivalents of GS-13 Step 2 salary using 2023 OPM Pay Chart in Washington DC locality

** Cost of awarded contract

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

This is an extension of the previously approved collection with no changes.

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

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I. There are no exceptions to the certification statement being requested.