

2024–2025 National School Foods Study

OMB Supporting Statement **Part A**

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INTRODUCTION

This information collection request is for the 2024–2025 National School Foods Study, a new iteration of three previous studies; two were canceled during the Covid-19 pandemic and one is to be updated for the first time: 1) School Nutrition and Meal Cost Study-II (SNMCS-II) (OMB Control Number 0584-0648, expired 9/30/2022), 2) School Food Purchase Study (SFPS-IV) (OMB Control Number 0584-0471, withdrawn 6/11/2021), and 3) an evaluation of the Fresh Fruit and Vegetable Program (FFVP) (OMB Control Number 0584-0556, expired 06/30/2013).

The SNMCS-II component of the 2024–2025 National School Foods Study will provide a comprehensive picture of the National School Lunch and School Breakfast programs (NSLP and SBP, respectively), along with critical information about the nutritional quality, cost, and acceptability of school meals 12 years after major reforms began being phased in during the 2012–2013 school year (SY). SNMCS-II will collect a broad range of data from nationally representative samples of public school food authorities (SFAs); public, noncharter schools; students; and parents/guardians during SY 2024–2025. These data will provide current information about how the federally sponsored school meal programs are operating. In addition, selected findings from the SNMCS-II component will be compared to those from SNMCS-I in SY 2014–2015 (OMB Control Number 0584-0596, expired 08/31/2017) . SNMCS-II will also estimate the costs of producing reimbursable school meals in five States and Territories outside the 48 contiguous States and the District of

Columbia (DC) and examine the relationship of costs to revenues in those outlying areas.

The SFPS-IV component of the study will provide national estimates of public SFA food acquisitions (commercial purchases and USDA Foods) in terms of both cost and volume, in addition to a description and analysis of food purchase practices in SY 2024–2025. The study will also assess changes in food acquisitions and purchase practices since the previous study in SY 2009–2010.

The FFVP evaluation component of the study will compare student- and school-level outcomes in FFVP participating and nonparticipating schools in SY 2024–2025. This component will address the primary research question of whether students in participating schools eat more fruits and vegetables.

This Information Collection Request (ICR) describes substantive changes to instruments or procedures that differ from the previous requests for SNMCS-II and SFPS-IV, which were never collected given the global pandemic. Given that this evaluation of FFVP differs substantially from the previous evaluation, this ICR does not compare the FFVP instruments and procedures to the previous, SY 2010-2011 study. ICRs for SNMCS-II and SFPS-III were previously approved under OMB Control Number 0584-0648 (expired 9/30/2022) and OMB Control Number 0584-0471 (expired 3/31/2012), respectively. A reinstatement with changes of a previously approved collection was submitted for SFPS-IV but withdrawn on 6/11/2021. The previous SNMCS-II and SFPS-IV data collections were postponed and eventually canceled because of the COVID-19 pandemic. The materials for

those studies have been updated but are very similar to previously approved collections.

PART A. JUSTIFICATION

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.

This is a new information collection request. The school meal programs administered by the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) are a cornerstone of the nation’s nutrition safety net for low-income children. The 2024–2025 National School Foods Study continues the long-standing commitment of FNS to periodically assess the NSLP and SBP as well as the FFVP. It will provide a comprehensive picture of these programs in SY 2024–2025

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) mandated substantial changes to the nutrition standards for school meals. These changes were implemented beginning in SY 2012–2013. The goal of the updated standards was to increase the alignment of school meals with the Dietary Guidelines for Americans and current information about the nutrient requirements of school-age children (Institute of Medicine 2010).¹ Key reforms stemming from this legislation included new, more stringent meal pattern and nutrient requirements for school meals, new offer-versus-serve rules, gradually increased prices for paid meals, and the introduction of

¹ Now the National Academy of Medicine.

standards for competitive foods, called the Smart Snacks in School nutrition standards.

SNMCS-II. SNMCS-I (OMB Control Number 0584-0596, discontinued 07/31/2017) provided information about how SFAs and schools implemented the reforms and how these reforms affected the school meal programs. With the SNMCS-II component of the study, FNS intends to update the information from SNMCS-I and also examine the costs of producing school meals in certain States and Territories that were not part of SNMCS-I. This information will provide Federal, State, and local policymakers with current information about how federally sponsored school meal programs operate by updating the information collected in SY 2014–2015 for SNMCS-I. Findings from SNMCS-II will be compared to those from SNMCS-I to explore trends in key domains, including the nutritional quality of school meals, meal costs and revenues, and student participation, plate waste, and dietary intakes.

The Outlying Areas component will estimate the costs of producing reimbursable school meals in Alaska, Guam, Hawaii, Puerto Rico, and the United States Virgin Islands (USVI). This information will be used to inform reimbursement rate adjustments in these areas per Section 12(f) of the Richard B. Russell National School Lunch Act (NSLA), which authorizes the USDA to adjust the rates in these areas provided that such adjustments reflect the difference between the costs of providing reimbursable meals in the outlying areas compared to the contiguous 48 States and DC.

SFPS-IV. The SFPS-IV component will provide updated national estimates of SFA food acquisitions (commercial purchases and USDA Foods)

and an analysis of food purchase practices in SY 2024–2025. In addition, the study will assess changes in food acquisitions and purchase practices since SFPS-III to provide important information about the impact of updated nutrition standards for meals and nonprogram (competitive) foods and other changes made to the school meal programs following passage of the HHFKA. Current information about food buying efficiencies will be useful for SFAs as they strive to maximize available resources and improve food service operations.

FFVP. The FFVP evaluation component will examine school- and student-level outcomes by comparing schools that do and do not participate in the FFVP, primarily to identify whether students in participating schools eat more fruits and vegetables. The study will also examine FFVP implementation and whether variations in implementation methods relate to student participation. This evaluation will produce nationally representative estimates of elementary school students in schools that participate in the FFVP and nationally representative estimates of FFVP schools.

The primary objectives of each study component are summarized in Table A.1.

Table A.1. National School Foods Study objectives

School Nutrition and Meal Cost Study-II (SNMCS-II) component objectives	
Objective 1	<ul style="list-style-type: none"> Describe the school environment, food service operations, levels of student participation, and other characteristics of school food authorities (SFA) and schools participating in the National School Lunch and School Breakfast programs
Objective 2	<ul style="list-style-type: none"> Determine the food and nutrient content of school meals and after-school snacks and the overall nutritional quality of these meals and snacks Determine whether competitive foods sold by school food service departments are consistent with Smart Snacks standards
Objective 3	<ul style="list-style-type: none"> Determine the cost of producing reimbursable school meals and snacks Examine the ratio of revenues to costs Determine the costs associated with distributing, collecting, and processing household applications for free and reduced-price meals
Objective 3	<ul style="list-style-type: none"> Determine the cost of producing reimbursable school meals in outlying areas (Alaska, Guam, Hawaii,

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Outlying Areas	Puerto Rico, and United States Virgin Islands)
Objective 4	<ul style="list-style-type: none"> Describe student characteristics, participation, student/parent satisfaction, and plate waste Describe food and nutrient intakes of school meal participants and nonparticipants
School Food Purchase Study-IV (SFPS-IV) component objectives	
Objective 5	<ul style="list-style-type: none"> Develop national estimates of the types, amounts, and costs of food purchases and USDA Foods, including differences in the mix of foods acquired by SFAs Describe school food purchase practices and examine relationships between costs of food, food purchase practices, and SFA characteristics Describe changes in the mix of food acquired by SFAs since SFPS-III and the extent to which the costs of food have changed
Fresh Fruit and Vegetable Program Evaluation component objectives	
Objective 6	<ul style="list-style-type: none"> Compare student in-school dietary intake in FFVP schools and non-FFVP comparison schools Compare FFVP schools and non-FFVP schools Describe the characteristics of SFAs that offer the FFVP Describe the methods schools use to implement the FFVP Describe implementation challenges Describe student participation and how it relates to student characteristics and the way schools implement the program

Legal or Administrative Requirements

Section 28(a) of the NSLA (Appendix A) authorizes the USDA Secretary to conduct performance assessments of the school meal programs, including the nutritional quality of the meals and the costs of producing them. Section 28(c) requires “States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs” authorized under the NSLA and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) to cooperate with program research and evaluation being conducted on behalf of the USDA Secretary under those acts. Section 19(h) of the NSLA also established a legislative requirement for an evaluation of the impact of the FFVP on students’ consumption of fruits and vegetables, among other outcomes (Appendix A).

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

For what purpose the information is to be used

Data from SNMCS-I and SFPS-III were used to assess initial implementation of the HHFKA reforms in the NSLP and SBP and continue to be used to evaluate legislative, regulatory, and budgetary impacts of proposed policy changes. This study will be used for the same purposes and to assess changes over time.

The study will collect a broad range of data from nationally representative samples of public SFAs and their State Distributing Agencies (SDA), schools, students, and parents/guardians² during SY 2024–2025 in the 48 contiguous States and DC. These data will provide needed information about how federally sponsored school meal programs are operating over the 10 years following implementation of major reforms, including new nutrition standards that went into effect in SY 2012–2013 and more recent changes that will be in effect during SY 2024–2025.

The study will address numerous research questions of interest to the USDA, States, SFAs, and other program stakeholders under the six broad study objectives listed above. In addition to providing nationally representative findings within these broad topic areas, findings from the SNMCS-II component will be compared to findings from SNMCS-I to explore trends in food service operations, the nutrient content of school meals, meal costs and revenues, and student participation, plate waste, and dietary intakes. The SNMCS-II component will also examine relationships among the key domains, especially among nutritional quality, cost, and student participation. Findings from the Outlying Areas component will be used to

² We generically refer to *parents* for discussion purposes, recognizing that responding individuals might be legal guardians or other caregivers who are the most familiar with what students eat outside of school.

inform reimbursement rate adjustments in the outlying areas per Section 12(f) of the NSLA. The SFPS-IV component will provide needed information on how SFAs are procuring foods, the composition of their procurements, and changes that have occurred since SFPS-III and implementation of the nutrition standards starting in SY 2012-2013. The FFVP evaluation component will address the question of whether the students in participating FFVP schools consume more fruits and vegetables than those in nonparticipating schools, thus meeting a key program goal.

Finally, this collection considers voluntary versus mandatory collection based on type of respondent: we consider States, SFAs, and schools as mandatory and parents and students as voluntary, given the NSLA and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) to cooperate with program research and evaluation being conducted on behalf of the USDA Secretary under those acts, such as this study (as in the previous question). The language on the recruitment materials and instruments are reflective of that distinction. Declining to participate will not result in a loss of benefits or receive any penalty at any level.

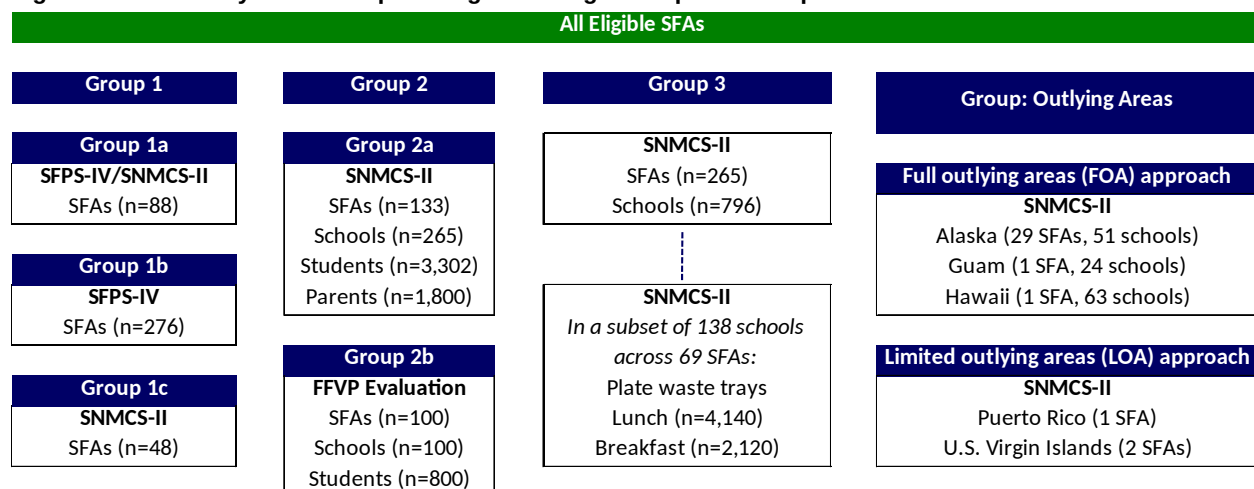
How and by whom the information will be collected

A contractor will collect the information on behalf of FNS from approximately 54 States and Territories (including DC), 962 SFAs, 1,299 schools, and 2,977 students and their parents. In the Outlying Areas component of SNMCS-II, Alaska, Guam, and Hawaii will participate in the full outlying areas (FOA) approach with representative samples of public schools; one SFA in Puerto Rico and two in USVI will participate in the limited outlying

areas (LOA) approach. The study sample is divided into groups with different data collection activities depending on study component and objectives that will be addressed by each group’s data (Figure A.1). Data will be collected via web and hard-copy surveys; requests for electronic data extracts; in-person, telephone, and video interviews; and observations. The tables in Appendix B summarize the data collection plans for the study, including respondents, target number of completes, mode, estimated burden, target response rate, and starting sample sizes.

States, SFAs, and schools are required to cooperate with the study per Section 28 of the NSLA. However, participation is not required for them to obtain Federal benefits. Data collection from States, SFAs, and schools are not part of an audit, and student and parent participation has no effect on services or benefits students and parents may receive or apply for in the future. An Institutional Review Board (IRB) approved the study procedures and instruments (Appendix C01).

Figure A.1. Summary of the sample design and target completed sample sizes



More detailed information on recruitment procedures and related appendices can be found in Appendix B.

A.2.4. Data collection plans

The data collection plans for the 2024–2025 National School Foods Study include the following instruments and contact materials:

- SFPS-IV data collection (Appendices F01.01, F01.02, F01.03, F01.04, F01.05, F01.06, F01.07, F01.08, F01.09, F01.10, F01.11, F01.12)
- SNMCS-II Menu Survey, Fruit and Vegetable Questions and Meal Pattern Crediting Report, and FFVP Menu Survey (Appendices F02.01, F02.02, F02.03, F02.04)³
- SFA Director Survey (Appendices F03.01, F03.02, F03.03, F03.04, F03.05, and F03.06)
- SNMCS-II Principal Survey (Appendices F03.07, F03.03, F03.05, and F03.08)
- SNMCS-II SNM Survey and FFVP SNM Survey (Appendices F04.01 and F04.02)
- SNMCS-II cost study data collection (Appendices F05.01, F05.02, F05.03, F05.04, F05.05, F05.06, F05.07, F05.08, F05.09, F05.10, F05.11, F05.12, F05.13, F05.14, F05.15)
- Reimbursable Meal Sale Data Request (Appendix F06)
- Observation Guide (Appendix F07)
- Student and parent data collection (Appendices F08.01, F08.02, F08.03, F08.04, F08.05, F08.06, F08.07, F08.08, F08.09, F08.10, F08.11, F08.12)
- Plate waste observations (Appendix F09)

These plans are described in further detail in Appendix G because they are largely the same as those in the previous SNMCS-II (OMB Control Number 0584-0648, expired 9/30/2022) and SFPS-IV ICRs (OMB Control Number

³ The Menu Surveys for Groups 2a, Group 3, and FOA will be administered either as self-administered web instruments or hard-copy booklets. The Menu Survey for Group 2b and LOA will be hard-copy only. The burden shown on the first page of the booklets includes all of the forms that are included in that booklet.

0584-0471, withdrawn 6/11/2021). In this submission, the substantive changes to the data collection instruments follow:

- For the SNMCS-II component: Revisions to the SNM Survey (Appendix F04.01), Observation Guide (Appendix F07), School Sources of Food (Appendix F08.03), and Parent Interview (Appendix F08.04)
- For the SFPS-IV component: Creation of the SFPS Food Purchase Planning Interview (Appendix C14) and SFPS SFA Year-End Follow-Up Survey (Appendix F01.04) and revisions to the SFPS Quarterly Program Data Form and Food Purchase Data Request Email (Appendix F01.01) and SFPS Food Purchase Data Checklist (Appendix F01.02)
- For the FFVP evaluation component: Creation of the FFVP Menu Survey (Appendix F02.04) and FFVP SNM Survey (Appendix F04.02) and revisions to the Student Interview (Appendix F08.01) and Parent Active Consent Response Form (Appendices D10 and D11)

In addition, we revised the SFA Director Survey (Appendix F03.01) to combine the SNMCS-II SFA Director Survey and SFPS-IV Survey of Food Purchase Practices into one instrument.

Frequency of data collection

Data collection will span all of SY 2024–2025, with follow-up data collection for Groups 1a, 1b, 3, and the Outlying Areas in fall 2025.

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

FNS will share publicly the reports generated from the 2024–2025 National School Foods Study on its website. Additionally, 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). Appropriately de-identified data and documentation will be shared, per USDA Departmental Regulation DR

1020-006 *Public Access to Scholarly Publications and Digital Scientific Research Data*, on AgDataCommons (<https://agdatacommons.nal.usda.gov/>).

A.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.

In compliance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce respondent burden. Out of the total 141,365 responses for this collection, 23,356 (16.5 percent) will be collected electronically.⁴ Surveys of State Education Agency finance officers, SFA directors, SNMs, and school principals (Appendices C06, E02, E13, F03.01, F04.01, F03.0742, F05.01) will be web-based; State Child Nutrition Agency Directors will also be asked to submit data electronically.⁵

The Electronic Menu Survey (EMS) and embedded Fruit and Vegetable Questions and Meal Pattern Crediting Report will also be web-based (Appendices F02.01 F02.02, and F02.03). The EMS is a user-friendly web system that includes several features for reducing the burden of the hard-copy Menu Survey forms used in previous studies of school meals. For example, the Menu Survey screener questions are administered before the target week to identify which Menu Survey forms are relevant to a school, on the basis of its food service program. Rather than asking SNMs to participate in a telephone-based training on how to complete EMS forms, those

⁴ The estimated number of responses collected electronically includes web, Computer Assisted Personal Interview, Computer Assisted Telephone Interview, or submission of an electronic spreadsheet or data extract.

⁵ The electronic versions of the instruments are not yet available.

instructions will be provided by using brief modular, online training videos. SNMs can review this information at their convenience and interact with technical assistants (TA) over the phone or email whenever needed. The EMS includes a dashboard so that respondents may track their progress in completing the forms each day during the target week. It also allows respondents to create an electronic “favorites” list for saving information on foods offered repeatedly across the week. The EMS includes a variety of validation checks that alert respondents to missing, out-of-range, or inconsistent data.

Most of the cost data collection instruments (Appendices F05.02/F05.03, F05.10, F05.12, F05.06/F05.07) will be computer-assisted instruments, which will both decrease respondent burden and increase data quality. Burden will be reduced by programming skips for nonapplicable questions; pre-filling information from prior instruments or questions, therefore removing the need for duplicative questions or the manual entry of linking codes (for example, a code that links staff salaries to staff activities); and automatically calculating cost totals in lieu of respondents completing the calculations. Data quality will improve with the use of edit checks. We will also use screen-sharing when possible to facilitate the Outlying Areas interviews. The State Agency Indirect Cost Survey and the SFA Follow-Up Web Survey (Appendices F05.01 and F05.06/F05.07) will be self-administered over the web. Use of web-based surveys will enable us to reduce respondent burden associated with organizing paper documents and transcribing repeated information

between forms; they will also streamline the process of data retrieval, cleaning, and coding.

We will use software to conduct the Student Interview (Appendix F08.01) and collect data on students' dietary intakes (Appendix F08.02). The AMPM⁶ software obtains information from respondents in five standardized steps designed to efficiently collect complete and accurate food intake data while minimizing respondent burden.

The Parent Interview (Appendix F08.04) will be fielded as a multimode instrument, available for parents to complete in-person or over the web using the respondent's unique web link or by phone. This multimode administration will offer parents greater flexibility, such as accessing the web survey at all hours, and may gain cooperation among respondents who do not want to speak on the phone.

For the SFPS-IV component, the Quarterly Program Data Form (Appendix F01.03) and SFA Year-End Follow-Up Survey (Appendix F01.04) will be web-based⁷. We will collect data for the SDA Quarterly USDA Foods Data Request (Appendix F01.05) and Quarterly Food Purchase Data Request (Appendix F01.01) via electronic submittal. Additionally, instructions for food purchase data submissions will be provided during live and recorded webinars. SFAs who are unable to attend live webinars may retrieve the recordings at their convenience and interact with study staff by phone or email as needed.

Overall, approximately 17% of responses will be collected electronically.

⁶ The USDA Automated Multiple Pass Method is a computerized method for collecting interviewer-administered dietary recalls.

⁷ The electronic versions of the instruments are not yet available.

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

There is no similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely administers the school meal programs.

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

Excluding the largest SFAs (described further in Supporting Statement Part B.2), approximately 926 SFAs in the sample, or 99 percent of the SFAs participating in the study, fall below the threshold to be considered a small entity.⁸ Although there are small SFAs involved in this data collection effort, they deliver the same program benefits and perform the same functions as any other SFA. Thus, they maintain the same types of information on file. The information being requested is the minimum required for the intended use. Out of the 22,571 total respondents for this collection, 2,720 (12 percent) are SFA- or district-level respondents from small entities.⁹

A.6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The 2024–2025 National School Foods Study involves a one-time data collection for each respondent. Without this information, FNS will not be able

⁸ 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. We have estimated that the approximately six SFAs in the certainty selection for the mainland study are not small entities.

⁹ The respondents from these SFAs include superintendents, SFA directors, and LEA business managers. Of the 2,806 unique SFA-level respondents, 2,720 (97 percent) are expected to be from small entities.

to assess progress toward key strategic goals for the NSLP, SBP, and FFVP or determine appropriate adjustments to the reimbursement rates in the outlying areas.

A.7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- 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.

FNS is requesting that school liaisons return the completed student rosters within two weeks after they receive the request in order to allow sufficient time to ensure that the roster is complete, draw the sample of students, distribute consent materials to parents, and receive consent/nonconsent before data collection. In many cases, we expect that SFAs and schools will be able to extract the roster data from an existing

database within this time frame, but we will also work with respondents to accommodate longer timelines if needed.

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

A.8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

Federal Register Notice and Comments

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register* on December 19, 2023 (vol. 88, no. 242, pp. 87736–87749). The public comment period ended on February 20, 2024. FNS received a total of seven comments, all of which were germane to the study (Appendix I01). Appendix I02 includes FNS's responses to these comments, which are also summarized here. None of the comments resulted in changes to the study.

Five of the comments (Appendix I01, pp. 2-15) focused on the need to better understand plant-based offerings and alternate protein meal options. The commenters seek to understand plant-based foods, aside from nut-butter sandwiches specifically; parent and student demand for such items; prevalence of processed and red meat offerings; and nutritional characteristics of plant-based entrees. As included in the responses, the parent and student instruments (Appendices F08.04 and F08.01) already

provide the opportunity for respondents to provide information about what they consumed, including but not limited to plant-based options. Further, we will be able to estimate the prevalence of plant-based offerings in school meals at the school level and will also understand the consumption of plant-based meals and products at the student level, as we conduct dietary recalls as part of this research.

Two comments (Appendix I01, pp. 16-19) focused on the offering and consumption of dairy products, mostly focused on milk. Similarly, based on the data we will collect, we will be able to estimate the prevalence of varied dairy products at the school level and consumption of dairy products. One commenter (Appendix I01, pp. 18-19) was interested in calculating the take rate for “offer versus serve” and we will consider that option as determine our dissemination products.

Since none of the comments changed the scope of this information collection, FNS has made no modifications as a result of these comments.

The information request has also been reviewed by Jennifer Rhorer with the USDA National Agricultural Statistics Service (NASS) with reference to the statistical procedures. Those comments and the FNS response are in Appendix N. Expert Consultations

Table A8.1 shows the external experts who reviewed the full study plan and consulted on the research and sample design. Reviewers requested clarifications on study details, including additional details on the SFPS-IV component of the study. The study team revised the plans to include these details where requested. The team clarified questions on the sample, including but not limited to how SFAs would be assigned to the groups, as well as estimated levels of precision, how potential incentives would be

calculated, questions on comparisons to previous studies, and reflections on the challenges in collecting data in the outlying areas.

Table A8.1. Expert consultations

Name	Year of consultation	Title	Organization
Andrea C.	2023	Administrator	Ohio Department of Youth Services
John E.	2023	Former senior program analyst at USDAs FNS, project officer on SNMCS-I	N/A
Dora R.	2023	School nutrition specialist–Consultant	School Food Systems Solutions

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

As approved in the previous iterations, FNS requests the offer of gift card incentives to SFA and school staff, parents, and students.¹⁰ The proposed incentives are part of a multidimensional approach to minimizing nonresponse bias and data collection costs that also includes minimizing response burden, communicating the importance of the study, and attempting to reach nonrespondents multiple times.^{11,12,13} (Section B.3 describes strategies to increase response rates.) The purpose of incentives is to (1) reduce nonresponse bias, (2) improve data quality, and (3) reduce data collection costs. Considerable experimental evidence has demonstrated that offering incentives encourages those less interested in the research to

¹⁰ We will adhere to district or school policy if employees are prohibited from accepting incentives.

¹¹ Groves, R. M., R. B. Cialdini, and M. P. Couper. “Understanding the Decision to Participate in a Survey.” *Public Opinion Quarterly*, vol. 56, 1992, pp. 475–495.

¹² Singer, E., and C. Ye. “The Use and Effectiveness of Incentives in Surveys.” *Annals of the American Academy of Political and Social Science*, vol. 645, no. 1, 2013, pp. 112–141.

¹³ Singer, E. “Introduction: Nonresponse Bias in Household Surveys.” *Public Opinion Quarterly*, vol. 70, no. 5, 2006, pp. 637–645.

participate, which may reduce nonresponse bias.^{14,15,16} Incentives must be high enough to equalize the burden placed on respondents with respect to their time and cost of participation, including the time needed for data retrieval. Minimizing the cost of completing study activities and maximizing the social reward for respondents can increase the likelihood that respondents will participate.^{17,18} Without incentives, it is possible that only individuals able to overcome financial barriers will participate. Respondents from lower-income areas or with lower household incomes may be underrepresented. Given that schools are still dealing with understaffing because of the COVID-19 pandemic and shouldering additional burden and stressors,^{19,20,21} incentives may be a particularly important means of increasing the response rate. In addition, incentives treat respondents justly and with respect by recognizing and acknowledging the effort they expend to

¹⁴ Groves, R., E. Singer, and A. Corning. “Leverage-Saliency Theory of Survey Participation: Description and an Illustration.” *Public Opinion Quarterly*, vol. 64, no. 3, 2000, pp. 299–308.

¹⁵ Groves R. M., M. P. Couper, S. Presser, E. Singer, R. Tourangeau, G. Acosta, and L. Nelson. “Experiments in Producing Nonresponse Bias.” *Public Opinion Quarterly*, vol. 70, no. 5, 2006, pp. 720–736.

¹⁶ Singer, E., and R. A. Kulka. “Paying Respondents for Survey Participation.” In *Studies of Welfare Populations: Data Collection and Research Issues*. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. National Academies Press, 2002, pp. 105–128.

¹⁷ Dillman, D. *Internet, Mail, and Mixed-Mode Surveys: The Tailored Design Method*. John Wiley, 2009.

¹⁸ Porter, S. R. “Raising Response Rates: What Works?” *New Dimensions for Institutional Research*, vol. 2004, no. 121, 2004, pp. 5–21.

¹⁹ Liss-Levinson, R. “K–12 Public School Employee Views on Finances, Employment Outlook, and Safety.” MissionSquare Research Institute, 2021.

²⁰ Steiner, E., and A. Woo. “Job-Related Stress Threatens the Teacher Supply: Key Findings from the 2021 State of the U.S. Teacher Survey.” RAND Corporation, 2021.

²¹ Westphal, A., E. Kalinowski, C. Hoferichter, and M. Vock. “K–12 Teachers’ Stress and Burnout during the COVID-19 Pandemic: A Systematic Review.” *Front Psychology*, vol. 13, 2022.

participate.^{22,23} The incentives for this study were calculated using the previously approved incentives from SNMCS-II (OMB Control Number 0584-0648, expired 9/30/2022) and SFPS-IV (OMB Control Number 0584-0471, withdrawn 6/11/2021). The calculations consider the more than 10 years of inflation since the previous studies and the overall decrease in survey response rates since the COVID-19 public health emergency.^{24,25} Appendix J describes the incentive plans for each respondent type, taking into account the burden associated with each instrument. All incentives will be paid via gift cards, with more information in Appendix G. Also in Appendix G is Table T2, which presents the proposed incentives and how the amounts relate to the opportunity cost of participation.

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

All respondents' information will be kept private and not disclosed to anyone but the analysts conducting this research, except as otherwise required by law. The study team will comply with all Federal and State laws to protect privacy, including the requirements of the Privacy Act of 1974. The study team will adhere to the requirements in the system of record notice

²² Halpen, S. D., J. H. Karlawish, D. Casarett, J.A. Berlin, and D.A. Asch. "Empirical Assessment of Whether Moderate Payments are Undue or Unjust Inducements for Participation in Clinical Trials." *Archives of Internal Medicine*, vol. 164, no. 7, 2004, pp. 801-803.

²³ Russell, M. L., D. G. Moralejo, and E. D. Burgess. "Participants' Perspectives." *Journal of Medical Ethics*, vol. 26, no. 2, 2000, pp. 126-130.

²⁴ Krieger, N., M. LeBlanc, P. Waterman, S. Reisner, C. Testa, and J. Chen. "Decreasing Survey Response Rates in the Time of COVID-19: Implications for Analyses of Population Health and Health Inequities." *American Journal of Public Health*, vol. 113, no. 6, 2023, pp. 667-670.

²⁵ Sastry, N., K. McGonagle, and P. Fomby. "Effects of the COVID-19 Crisis on Survey Fieldwork: Experience and Lessons from Two Major Supplements to the U.S. Panel Study of Income Dynamics." *Survey Research Methods*, vol. 14, no. 2, 2020, p. 241, NIH Public Access.

(SORN) titled FNS-8 USDA/FNS Studies and Reports (Appendix O) in the *Federal Register* on April 25, 1991 (vol. 56, pp. 19078-19080), which discusses the terms of protections that will be provided to respondents.

The individuals at the SDA, SFA, or school level participating in this study will be assured that the information they provide will not be released in a form that identifies them, though SDAs may already be publicly known. No identifying information will be attached to any reports or data supplied to USDA or any other researchers. For data collected through the State-level surveys and for the Outlying Areas data collected from SFA directors in the single SFAs in Guam, Hawaii, and Puerto Rico, the State Education Agency finance officers and SFA directors may be publicly known, but individual respondents will not be identified by name.

During the life of the project, hard-copy documents will be stored in secured file cabinets and rooms, and electronic data will be maintained on secured, password-protected computer servers. Names and phone numbers will not be linked to participants' responses, survey respondents will have a unique ID number, and analysis will be conducted on data sets that include only respondent ID numbers. Files containing personally identifiable information will be transferred by means of a secure file transfer site. Both sources of data will be accessible only by approved study staff. At the close of the study, all hard-copy documents will be shredded.

All contractor staff are required to sign a confidentiality agreement (Appendices K01/K02). In this agreement, staff pledge to maintain the privacy of all information collected from the respondents and not to disclose

it to anyone other than authorized representatives of the study. A discussion of privacy and obtaining parent consent and student assent will be included during training sessions with staff working on the project.

To enable other researchers to replicate the analyses or to address other research questions, a public-use database will be created. The database will include all of the variables that were collected or computed during analyses carried out to address the study’s research questions. To protect the privacy of respondents, we will exclude from the public-use data files any information that might enable users to identify specific schools, districts, or individuals.

USDA FNS Privacy Officer Deea Coleman reviewed and approved this collection on 03/14/2024 with no additional comments.

A.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.

The Parent Interview and the Student Interview include questions that may be sensitive. The contents of these interviews have been used extensively in previous surveys with no known evidence of harm. All parent and student respondents will be informed that participation is voluntary, that they can decline to answer any question they do not wish to answer, and that there are no negative consequences for not participating. Respondents will also be assured of privacy at the outset of the interview. If required by the district, students will receive a copy of the parent consent form, which describes how their privacy will be protected. (Procedures for obtaining

consent and assent are described in Section A.2.1.) All survey responses will be held in a secured manner; respondents' answers will not be reported to school officials or any other program or agency but will be combined with the responses of others so that individuals cannot be identified. FNS and the study team will comply with the requirements of the Privacy Act. The Privacy Act statement is included on instruments that collect personally identifiable information.

Survey questions in the Parent Interview on the following topics may be considered sensitive: eligibility for free or reduced-price meals, race and ethnicity, household composition, parent education and employment status, total household income, receipt of public assistance, household food security status, and housing status. The following topics in the Student Interview for middle/high school students may be considered sensitive: gender, eating habits associated with weight loss and weight gain, a request for parent contact information, and a request for the student's phone number if selected for a second recall. In the Student Interview for elementary students, gender and race and ethnicity may be considered sensitive, with the latter two asked only of students in Group 2b. The collection of this information, other than contact information, is necessary for addressing one of the study's primary objectives: to explain differences in student participation in and satisfaction with school food programs. Collecting parent contact information during the Student Interview will allow the study team to contact parents to complete the Parent Interview, and collecting the

telephone numbers of middle and high school students who are selected for a second dietary recall will facilitate completion of the recall interview.

Except for the elementary student race and ethnicity items, the above questions identified from the Student Interview were also used in SNMCS-II (OMB Control Number 0584-0648, expired 9/30/2022). Questions similar to those concerning the household's income and public assistance receipt by the household have been used successfully in SNMCS-I as well as in the SNDA studies and the Access, Participation, Eligibility, and Certification studies (OMB Control Number 0584-0530, discontinued 10/04/2017).

For Groups 3 and Outlying Areas SFAs, the only data collected that may be considered sensitive are staff salaries. However, district and school staff are considered public employees whose salaries are of public record. These data are essential to computing the cost of food service labor, which is a critical component in the calculation of the total cost per meal. To alleviate concerns about sharing staff salaries, we will ask for average salaries across staff who do the same tasks. For all individual respondents, we will remind respondents that individuals will not be identified, and that data will only be reported in the aggregate.

USDA FNS Privacy Officer Deea Coleman reviewed and approved this collection on 03/14/2024 with no additional comments.

A.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.**

With this submission, there are 22,571 respondents (13,473 respondents + 9,098 nonrespondents), 141,325 responses, and 36,653.62 burden hours.²⁶ The average number of responses per respondent is 6.44, and the average number of responses per nonrespondent is 6.00; for respondents and nonrespondents combined, the average number of responses is 6.26. The burden table included in Appendix H shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection. Table A12.1 summarizes burden for the affected public. Estimated response times are based on response times for similar instruments completed by the same types of respondents in SNMCS-I and SFPS-III and informed by pre-testing of selected 2024–2025 National School Foods Study instruments and protocols.

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

Annualized cost of respondent burden is the product of each type of respondent’s annual burden and average hourly wage rate using the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational and Wage Statistics for the following occupational groups:

- 11-0000 Management Occupations
(<https://www.bls.gov/oes/current/oes110000.htm>)
- 25-0000 Educational Instruction and Library Occupations
(<https://www.bls.gov/oes/current/oes250000.htm>)
- 13-0000 Business and Financial Operations Occupations
(<https://www.bls.gov/oes/current/oes130000.htm>)

²⁶ Totals include responses and burden associated with respondents and nonrespondents.

- 29-0000 Healthcare Practitioners and Technical Occupations (<https://www.bls.gov/oes/current/oes/290000.htm>)
- 00-0000 All Occupations (https://www.bls.gov/oes/current/oes_nat.htm)

Table A12.2 presents the respondent type, occupation code, and average hourly wages without fringe for sample members in Groups 1a, 1b, 1c, 2a, 2b, 3, and FOA. Students (elementary and secondary school students) were assumed not to have an hourly wage rate.

The hourly wage rates for LOA, without fringe, are calculated as the mean of the average hourly wage rate for Puerto Rico (Occupation Code 11-9039, Education Administrators, All Other) and USVI (Occupation Code 11-9032, Education Administrators, Kindergarten through Secondary), at \$39.00,²⁷ and include SFA Director, LEA Business Manager, Superintendent or State Child Nutrition Director.

²⁷ For Occupation Code 11-9039, Education Administrators, All Other, the average hourly rate is \$40.86 for Puerto Rico. For Occupation Code 11-9032, Education Administrators, Kindergarten through Secondary, the average hourly rate is \$37.13 in USVI, calculated by dividing total annual salary by 2,080 work hours per year (40-hour weeks for 52 weeks) because the hourly wage rate is not available.

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Table A12.1. Summary of burden for affected public

Affected Public	Responsive					Non-Responsive					
	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total burden	Est. No. of Non-Respondents	No. of Responses per Non-Respondent	Total Annual Responses	Est. total Hours per Response	Est. total burden	Grand total burden
State/Local Government	5,202	8.30	43,169	0.6275	27,089.91	894	9.12	8,157	0.0340	277.51	27,367.42
Private For Profit Businesses	66	4.29	283	0.3010	85.18	0	0.00	40	0.0501	2.00	87.18
Individuals	8,205	5.28	43,303	0.1596	6,910.39	8,204	5.66	46,413	0.0494	2,290.62	9,201.02
Total	13,473	6.44	86,755	0.3929	34,085.48	9,098	6.00	54,570	0.0471	2,568.13	36,653.62

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The estimated annualized cost for State/Local governments, which includes State CN Directors, State Education Agency Finance Officers, SDA Directors, SFA Directors, Business Managers, Superintendents, School Nutrition Managers, School Liaisons, and Principals, is \$1,420,411.43. The estimated cost of data collection for Private For Profit Business, which includes FSMC Managers and Distributors, is \$5,972.68. The estimated cost of data collection for Individuals, which includes Parents, is \$136,244.57. These costs account for a fully-loaded wage rate for all respondents, which adds 33 percent to each hourly wage for a total of \$1,562,628.67.

Table A.12.2. Respondent type, occupation code, and average hourly wages without fringe for Groups 1a, 1b, 1c, 2a, 2b, 3, and FOA

Respondent type	Occupation code	Average hourly wage without fringe
Groups 1a, 1b, 1c, 2a, 2b, and 3		
SFA Director or LEA Business Manager	11-9039, Education Administrators, All Other	\$47.99
School Nutrition Manager	11-9051, Food Service Managers	\$32.27
School Liaison	25-0000, Educational Instruction and Library Occupations	\$30.41
Superintendent	11-9033, Education Administrators, Postsecondary	\$55.38
Principal	11-9030, Education and Childhood Administrators	\$49.70
Parent	00-0000, All Occupations	\$29.76
State Child Nutrition Director, State Distributing Agency Director, or Education Agency Finance Officer	13-2050, Financial Analysts and Advisors	\$56.14
FSMC Manager or Distributor	11-1021, General and Operations Managers	\$59.07
FOA		
SFA Director, LEA Business Manager, Superintendent or State Child Nutrition Director	11-9039, Education Administrators, All Other (Alaska and Hawaii) 11-9032, Education Administrators, Kindergarten through Secondary (Guam)	\$38.11 ¹
School Nutrition Manager	11-9051, Food Service Managers	\$31.25 ²
State Education Agency Finance Officer	13-1199, Business Operations Specialists, All Other	\$39.20 ³
Principal	11-9032, Education Administrators, Elementary through Secondary	\$46.33 ⁴
FSMC Manager	11-1021, General and Operations Managers	\$48.07 ⁵

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¹ For Occupation Code 11-9032 Education Administrators, Kindergarten through Secondary, the average hourly wage in Guam was calculated by dividing the total annual salary by 2,080 work hours per year (40-hour weeks for 52 weeks). Average hourly rates are \$43.33 for Alaska, \$35.38 for Guam, and \$35.62 for Hawaii.

² Average hourly rates are \$37.79 for Alaska, \$20.48 for Guam, and \$35.47 for Hawaii.

³ Average hourly rates are \$41.16 for Alaska, \$36.99 for Guam, and \$39.45 for Hawaii.

⁴ The average hourly wage of each State or Territory was calculated by dividing the total annual salaries for Occupation Code 11-9032 by 2,080 work hours per year (40-hour weeks for 52 weeks). Average hourly rates are \$52.83 for Alaska, \$35.38 for Guam, and \$50.77 for Hawaii.

⁵ Average hourly rates are \$53.70 for Alaska, \$34.80 for Guam, and \$55.70 for Hawaii.

A.13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital and start-up or ongoing operation and maintenance costs associated with this information collection.

A.14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Including \$39,291.12 for fringe benefits ($\$119,094 \times 0.33$), the total for Federal employee time equals \$158,385.12 annually. The annualized government costs include the costs associated with the contractor conducting the project and the salary of the assigned FNS project officers. The total cost to the Federal government is to pay the contractor approximately \$25 million over a period of 60 months to conduct the study. This represents an average annualized cost of \$5 million, including labor and other direct and indirect costs. The annualized cost of this information collection also assumes a total of 1600 hours of Federal employee time (1100 hours for a GS-14, Step 6 at \$78.19 per hour and 500 hours for a GS-13, Step 6 at \$66.17 per hour), for a total annual cost of \$119,094. Federal employee pay rates are based on the General Schedule and on locality

payment for the Washington, DC, metropolitan areas provided by Office of Personnel Management for 2024 ([SALARY TABLE 2024-DCB \(opm.gov\)](#)).

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

This submission is a new information collection request as a result of program changes and will add 36,653.62 hours of burden and 141,325 total annual responses to OMB's inventory.

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

The study team will analyze the information collected by using descriptive tabular, cross-tabular, and multivariate modeling and analysis. Given the scale and complexity of the data processing and analyses across study components and objectives, the dissemination and data file/documentation phase is well suited for a staggered approach. Findings for study objectives that are simpler will be reported first (for example, Objective 1), and those with extensive data processing as well as follow-up data collection will come last (for example, Objectives 3 and 5). The reports will address the major areas of interest encompassed in the study's objectives. In reporting findings, we will use the names of the study components and the study school year throughout (instead of the study sequence numbers): SNMCS 2024-25, SFPS 2024-25, and FFVP Evaluation 2024-25. Potential products include reports, technical supplements or appendices to reports, FNS briefings, research or nontechnical briefs, journal articles, fact sheets, infographics, data visualizations, webinars, videos, and conference presentations. The team will prepare and release one report for

the Outlying Areas. All reports will be posted on FNS’s website. Analyses will follow these key steps:

- **Prepare analytic files.** Each data file will be checked for missing or inconsistent data and for outliers and will be cleaned and recoded as needed for statistical analysis. Cost and Menu Survey data will need considerable manipulation and detailed data checking in preparation for analysis. Data from the Menu Survey, the plate waste observations, and the dietary intake interviews will need to be coded to reflect the foods identified and the nutrients they contain—a task that involves the use of highly technical software, specialized databases, and skilled coders.
- **Prepare sampling and nonresponse weights.** The data will be weighted to produce nationally representative tabulations at each appropriate level of analysis (SFA, school, student and parent, and trays) for Groups 1a, 1b, 1c, 2a, 2b, and 3. For selected outcomes, researchers will also produce estimates by key subgroups of policy interest. For the Outlying Areas, the data will be weighted to produce representative estimates for each Territory. The study team will create the base weights for each study component. Weights will be adjusted for survey nonresponse within important sample subgroups and may be post-stratified to match key benchmarks.
- **Specify tabulations.** For each study domain, researchers will specify tabulations of the data for SFAs, schools, students and their parents, or meals nationally and for subgroups of policy interest. Key subgroups include SFA and school size (enrollment), poverty level, urbanicity, FNS region, school type (elementary, middle, high), SFA and school universal free-meal status (HSMFA, CEP, or none), and school meal participants/nonparticipants. As appropriate, analyses will be compared to results from SNMCS-I and SFPS-III, taking into account any methodological limitations to such comparisons. In addition, analyses of the food and nutrient content of school meals will be compared to nutrition standards in effect at the time the data were collected, and students’ diets will be compared to Federal dietary guidance for healthy diets. For the Outlying Areas, researchers will specify tabulations of the data for SFAs (and schools for FOA) that will provide Territory-level estimates of costs and revenues. As appropriate, findings for each outlying area will be compared to findings from the mainland study.
- **Estimate descriptive statistics, including cross-tabulations, using appropriate statistical methods.** Most of the analysis will be straightforward descriptive tabulations (producing estimates of means, proportions, and distributions) and bivariate (cross-tabular) analyses of surveys and observations. Analyses will be conducted with statistical software such as SAS, Stata, or R to compute standard

errors that adjust for the complex sample design. In addition, nutrient data will be analyzed with special statistical methods to estimate the distributions of usual nutrient intakes, using two days of dietary intake data for a subsample of students. For Groups 2a, 2b, and 3, statistical tests for differences between key subgroups will also be conducted. Differences in mean outcomes of interest between pairs of groups will be tested by using t-tests for means. For tests of association between a mean and a grouping variable with three or more categories (for example, the association between reported cost per lunch and region), we will use f-tests. Although the principal measures of interest will be means, we will use chi-square tests for frequency measures when applicable.

- Estimate multivariate regression models.** The study will examine outcomes for Groups 2a, 2b, and 3, such as meal costs and nutritional quality of meals, as a function of student, school, and school food service characteristics, using single-equation multivariate models. These will be estimated as reduced-form models in that the variables that mediate the outcomes—such as the characteristics of meals offered when analyzing participation or student dietary intakes—are omitted from the model to determine the associations of the broader policy variables while controlling for other exogenous factors. Recursive models will be used to examine the relationships among the school meal program costs and outcomes.

Project Time Schedule

Recruitment must begin by the start of a school year so that data collection can be completed for SY 2024–2025. The schedule below assumes activities can take place in SY 2024–2025 following OMB clearance.

Activity	Anticipated schedule
Recruit SFAs	Beginning (one week post-OMB approval)
Conduct data collection	Two weeks post-OMB approval–December 2025
Analyze data and prepare reports	October 2025–August 2026 (or 15 months post-OMB approval)
Prepare data files and documentation	March 2026–August 2027 (or 20 months post-OMB approval)

A.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.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.