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Subject: School Meals Operations Study: Year 5 Pre-Test Findings (51903)

A. Introduction

This memorandum describes key findings from the School Meals Operations (SMO) Study Year 5 pre-test of the State Agency Child Nutrition (CN) director survey and the revisions we recommend for the instrument based on pre-test findings.

Mathematica conducted the pre-test in February 2024 with four respondents, which included State CN directors in Michigan, Nebraska, New York, and Oklahoma Department of Human Services. We selected respondents based on their interest and availability to participate within the pre-test time frame.

We emailed hard-copy versions of the survey to confirmed respondents and instructed them to note any instructions or questions that were unclear or questions that were difficult to answer. We asked respondents to track how long it took them to complete the survey. We conducted 30-minute debriefing interviews with each pre-test respondent to identify questions that were confusing or difficult to answer, and to gather their recommendations for changes. Appendix A is the version of the State Agency CN Director Survey used in the pre-test, and Appendix B is the debriefing protocol for State CN directors. The final version of the State Agency CN Director Survey (3.5) will be delivered to FNS in April 2024.

B. State Agency CN Director Survey

1. Burden

We asked respondents to record how long it took them to complete each section of the survey, including the time needed to gather relevant data or information. Three of four respondents provided the time they started and finished each survey section. One respondent provided the time they estimate it will take to gather data needed to complete the survey instead of documenting their actual start and finish times for each survey section. Respondents spent an average of 20 minutes completing the survey (Table 1). However, two respondents estimated that the survey will take longer than 30 minutes to complete when including time to gather the requested data. One respondent reported that it will take them an additional 30 to 40 minutes to gather site and SFA counts for sections B and D. Another respondent estimated it would take over two hours to complete the survey. The Y5 State Agency CN Director Survey will be self-administered online, so completion times could be slightly less because of programmed automatic skips in the survey.

Although the average completion time, including both the reported and estimated time, is 54 minutes, we estimate this survey could take some respondents less than 30 minutes to complete, but other respondents may take up to two hours. Survey sections B and D are estimated to have the longest completion times, followed by section E. We recommend reviewing these sections to identify low priority questions to drop to ensure respondents can complete the survey within the 30 minute burden estimate.

Table 1. State CN Director Survey pre-test completion times by section and overall (in minutes)

Respondent	Overall	Section A: Meal Pattern Requirements	Section B: Summer Non-Congregate Meal Service	Section C: Buy American	Section D: Paid Lunch Equity	Section E: Child Nutrition Data Systems
1[a]	14	1	3	4	1	5
2	20	1	7	1	2	9
3[b]	27	2	8	9	2	6
4[c]	156*	1	60*	5	60*	30*
Average	54	1	20	5	16	13

SY = school year.

[a] This respondent did not have any local program operators operating SSO or SFSP.

[b] Respondent estimates that it would take an additional 30 to 40 minutes to collect accurate data for sections B and D.

[c] This respondent recorded how much time they estimate it would take to gather data needed to complete sections B, D, and E, instead of recording their actual start and stop times for those sections. The times listed for sections A and C are reported times.

* These times are estimates of how long it would take to complete the section, not reported times.

2. Modifications to the State Agency CN Director Survey

Most respondents reported that the survey was generally easy to understand and clearly organized, and one respondent recommended reorganizing the survey to make it easier for SAs to delegate sections or certain questions to appropriate staff members. All respondents noted that the relevant data from the 2023–2024 school year will be accessible when this survey is fielded in the fall, but some respondents expect it will take more than 30 minutes to gather the requested data and complete the survey. Overall, the respondents' feedback yielded several recommendations for changes to the survey.

Table 2 provides additional details about pre-test respondents' feedback on the survey and the changes we recommend to address their comments. In response to their feedback, we recommend reorganizing the survey questions, removing or revising certain questions to clarify intent, adding or revising terms, and adding some additional response options.

Table 2. State Agency CN Director Survey respondent feedback and recommended changes

Questions	Respondent feedback	Survey changes
Overall organization and flow of survey sections	One respondent shared that it is easier for them to collect responses from staff when the survey is organized by CN Program. They recommended reordering the survey by moving sections C (Buy American) and D (Paid Lunch Equity) to immediately follow section A (Meal Pattern Requirements).	We recommend reordering the survey so that sections that apply to specific CN Programs are grouped together. We suggest the following order: A. Meal Pattern Requirements B. Paid Lunch Equity C. Buy American D. Summer Non-Congregate Meal Service E. Child Nutrition Data Systems

Timing	Two respondents estimated that the survey would take more than 30 minutes to complete when including time to gather the requested data. One respondent estimated an additional 15 to 20 minutes for each section that asks for number of LPOs. Another respondent estimated needing about two hours to gather information to complete the survey, citing that more time is needed to gather information about non-congregate sites, bulk meals, and paid lunch equity.	We suggest revising the email that Reginal Offices send to SAs and the advance email to include a list of the data requested to help respondents identify the necessary data before they begin the survey. We also suggest making significant cuts to the survey sections and questions. FNS should consider dropping lower priority and higher burden questions to ensure respondents can gather the requested information and complete the survey within the 30 minute burden estimate. Below are the questions respondents expect to take the most time to answer. B1 a/b B2 a/b B3 a/b B4 B5 a/b B6 a/b B7 a/b B9 a/b B11 a/b D1 D2 E21
Section B organization and flow of survey questions	One respondent shared that it is easier for them to collect responses from staff when the survey is organized by CN Program. They recommended reordering the questions by displaying questions related to SSO together and questions related to SFSP together.	We recommend reordering the survey so questions about specific CN Programs are grouped together. We suggest the following order: SSO: B1a-B3a, B5a-11a SFSP: B1b-B3b, B4, B5b-11b
B5a, B5b	All respondents referenced that federal guidance provides a definition for the term "migrant site" and indicated that these sites serve children of migrant workers. One respondent recommended defining this term in the survey glossary section.	We recommend revising the glossary and items B5 and B6 to include the definition listed below for "migrant site." We recommend displaying the definition at the first mention of the term, and then including the definition as hover text on subsequent items that reference the term. "A migrant site is a site that predominantly serves the children of migrant workers."
B6a, B6b	One respondent reported that they cannot easily access the data on non-congregate sites right now but likely will be able to access this data more easily later this year, after a few systems updates. They noted that it can take months to get this data from a vender for SAs that use a vender for their data systems. Another respondent reported that they must access more than one system to obtain data on non-congregate sites.	We recommend revising the introduction section to include a list of the data requested to help respondents prepare before they begin the survey.

B8a, B8b	One respondent reported that the term "typical" was confusing and it was unclear whether they should report the average number of days' worth of meals that were distributed or the mode.	We recommend revising the question by replacing the word "typical" with "most common."
B10a, B10b	One respondent reported that this question was confusing. They interpreted the question to ask, "How much of the meal distributed was made up of bulk components?" This respondent thought SAs could interpret this question differently. One respondent recommended defining "Bulk food" in the survey.	For clarity, we recommend revising the question to read. "How much of the meal distributed was made up of bulk components?" We also recommend revising the glossary, B9, and B10 to include the following definition for bulk food packages: "Food packages that contain one or more items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four 1-cup servings."
C1	One respondent chose "No" for C1 because the SA does not have a State-specific policy. This State implements the federal policy but the language of options one (Yes, our State implements the Federal policy) and two (Yes, our State has a State-specific policy) did not resonate with the respondent.	We recommend replacing option 0 (No) with, "No, our State does not have a State-specific policy or implement the Federal policy."
D overall	One respondent noted it would be helpful to receive a list of data points needed to complete the survey ahead of receiving the survey, as this would help SA staff collect the appropriate data.	As noted above, we recommend revising the email that Reginal Offices send to SAs and the advance email to include a list of the data requested to help respondents identify the necessary data before they begin the survey.
E1/E3	All respondents reported handling NSLP and SBP processes in the same way, and noted it is not necessary to ask about the use of paper forms for these programs separately.	We recommend combining E1 and E3, and E2 and E4, to ask about NSLP and SBP processes in the same questions, for example, "For NSLP and SBP, did your State agency rely on paper forms (as opposed to digital forms) for any of the listed processes in SY 2023-2024?"
E1/E3/E5/7/E9 "digital forms"	Two respondents were unsure of the definition of digital forms and reported going "back and forth" about the meaning of this term before deciding on a response. For example, these SAs reported using digitally saved Excel spreadsheets and PDF forms for some processes. One respondent reported that the data from digitally saved Excel spreadsheets and PDFs are not shared with other systems, so this respondent considered them paper forms. This respondent also recommended that the study team define "digital forms" in the survey. The other respondent decided to count digitally saved Excel spreadsheets and PDFs as digital forms.	We recommend revising the glossary, section E introduction, and relevant section E items to include a revised definition for "digital forms." We recommend displaying the definition at the first mention of the term, and including the definition as hover text on subsequent items that reference the term. When defining digital forms, we recommend that FNS clarify whether digitally saved files (for example, Excel spreadsheets, fillable PDF forms, Word documents, or scanned PDF forms) that do not share information with other systems are considered digital or paper forms for the purpose of the survey.

E1/E3/E5/7/E9 "procurement"	One respondent asked if they should think about State level procurement when answering items E1/E3/E5/7/E9.	We recommend that FNS clarify whether SAs should think about State or local program operator procurement when answering this question.
E1/E3/E5/7/E9 response options	Some SAs oversee SSO but did not have any LPOs operating SSO.	We recommend adding the response option below to items E5 and E7: E5: "No SFAs operate SSO" E7: "No sponsors operate SFSP"
E2/E4/E6/E8/E10	One respondent reported that sometimes staff choose to use paper forms, for example, because staff have not been trained to use systems or electronic forms.	We recommend adding the response option below to items E2/E4/E6/E8/E10: "State agency staff chose to use paper forms"
E11/E13	One respondent reported modifying their existing system to accommodate the new data for non-congregate meal service and recommended adding a response option for this situation.	We recommend adding the response option below to items E11/E13: "Updated existing data systems"
E15/E16	One respondent described a data system as something that was comprehensive and able to integrate information. The respondent did not consider storage of electronic documents (for example, Excel spreadsheets and PDF forms) with static information to be a data system. The respondent recommended clarifying the study definition of "CN data system" and placing the definition somewhere that would "jump out" to respondents.	We recommend revising the glossary, section E introduction, and relevant section E items to include a revised definition for "CN data system." We recommend displaying the definition at the first mention of the term, and then including the definition as hover text on subsequent items that reference the term. When defining CN data system, we recommend that FNS clarify whether an integration feature is required to meet the definition of a data system. For example, a definition could be, "Digital systems used to share, store, and/or manage CN Program data, including digital forms."
	This respondent described having a digital place to store claiming data used for federal reporting, but they do not consider the agency to have a data system overall. The respondent reported that the system is old and the respondent doesn't have a way of knowing where it is hosted.	We recommend leaving the question text as is. Three of four respondents were able to answer this question. Respondents who do not have a way of knowing where their data system is hosted can select "Don't know."
E20	One respondent reported that the TIG could have been used to develop a new system, implying a new system could be for something other than for Summer EBT.	We recommend revising the response option "Replaced an old system" to read, "Built a new system or replaced an old system."
	One respondent noted that TIG funds potentially could have been used to pay a staff member to support how funds are used, but the respondent was unsure if paying staff was an approved use of TIG funds.	We reviewed the Non-competitive Technology Innovation Grant (nTIG) webpage to identify potential uses for these funds. We recommend adding the response options below: • Purchased technology equipment and/or software or hardware • Hired new staff or contractors • Trained new staff or contractors

E21	Respondents thought about different elements of maintenance and operations costs when answering E21. Two respondents noted that it would take significant time to gather accurate cost information to answer this question.	We recommend dropping this item.
	Examples of various cost elements that SAs considered when answering E21 are described below.	
	• Costs for "up keep," server or cloud based storage, and login and annual licensing costs.	
	• Costs for IT programming and CN program staff time, and resources to keep the system maintained.	
	• Funds paid to the department of management, technology, and budget on a quarterly basis for the data systems.	
	• Costs associated with an annual maintenance agreement with a vendor.	

CN = Child Nutrition; LPO = Local Program Operator; EBT = Electronic Benefit Transfer; SSO = Seamless Summer Option; TIG = Technology Innovation Grant.