

**SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-0607:
School Meals Operations (SMO) Study**

August 8, 2024

Darcy G ng r

Social Science Research Analyst

Evidence, Analysis, and Regulatory Affairs Office

USDA, Food and Nutrition Service

1320 Braddock Place, Alexandria, VA 22314

Table of Contents

A1.	Circumstances that make the collection of information necessary.....	1
A2.	Purpose and Use of the Information.....	1
A3.	Use of information technology and burden reduction.....	3
A4.	Efforts to identify duplication.....	4
A5.	Impacts on small businesses or other small entities.....	4
A6.	Consequences of collecting the information less frequently.....	5
A7.	Special circumstances relating to the Guidelines of 5 CFR 1320.5.....	5
A8.	Comments to the Federal Register Notice and efforts for consultation.....	6
A9.	Explain any decisions to provide any payment or gift to respondents.....	7
A10.	Assurances of confidentiality provided to respondents.....	8
A11.	Justification for any questions of a sensitive nature.....	9
A12.	Estimates of the hour burden of the collection of information.....	9
A13.	Estimates of other total annual cost burden.....	12
A14.	Provide estimates of annualized cost to the Federal government.....	12
A15.	Explanation of program changes or adjustments.....	13
A16.	Plans for tabulation, and publication and project time schedule.....	13
A17.	Displaying the OMB Approval Expiration Date.....	14
A18.	Exceptions to the certification statement identified in Item 19.....	14

Appendices

- A. National School Lunch Act
- B. Web survey about school year 2023-24
- C. Administrative data requests for fiscal year 2024
 - 1. FNS-10 administrative data request
 - 2. FNS-418 administrative data request
 - 3. FNS-44 administrative data request
- D. Participant outreach:
 - 1. Study support email from FNS Regional Office to State Agency
 - 2. Advance email
 - 3. Study brochure
 - 4. Survey email
 - 5. Survey reminder email

6. Survey reminder phone script
 7. Survey last chance post card
 8. Administrative data phone script
- E. Web survey pre-test memo
 - F. FNS Privacy Act System of Records Notice
 - G. Confidentiality pledge
 - H. Review by National Agricultural Statistics Service
 - I. Burden Table

A1. 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 information collection request is for a revision of the approved collection for the School Meals Operations (SMO) Study (OMB Control Number 0584-0607, expiration date: 8/31/2026).

Section 28 of the National School Lunch Act (Appendix A) authorizes the Secretary of the USDA, acting through the Food and Nutrition Service (FNS) Administrator, to conduct annual national performance assessments of its Child Nutrition Programs, and requires State Agencies to cooperate with the assessors. Accordingly, FNS conducts annual assessments of the National School Lunch Program (NSLP), School Breakfast Program (SBP), NSLP Seamless Summer Option (SSO), Summer Food Service Program (SFSP), and Child and Adult Care Food Program (CACFP) using a series of research studies under OMB Control Number 0584-0607. The most recent study in the series is called the School Meals Operations (SMO) study. The SMO Study has collected four years of data (about school years 2019-20 through 2022-23), and this information collection request is to collect a fifth year of data (about school year 2023-24).

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The SMO Study will collect two kinds of information from the State Agency respondents: a web survey about school year 2023-24 (Appendix B) and administrative data about fiscal year 2024 (Appendices C1-3). The information collection is mandatory under the National School Lunch Act (Appendix A), as described in response A1. State agency respondents have had a 100% response rate in all prior study years so we expect a 100% response rate this year too.

Purpose of the web survey

The annual web survey collects information about program operations and topics of current policy interest, which FNS uses to make evidence-based decisions about program policies and budgets, identify technical assistance needs, and track important program operation information across time. During the COVID-19 pandemic, the surveys also collected information required by the Families First Coronavirus Response Act about the use of Child Nutrition Program waivers and whether they improved services to children.

Most of the questions in the school year 2023-24 survey were chosen to help FNS understand program operations in the context of recent rulemaking that resulted in major policy changes (updated meal pattern requirements for NSLP and SBP; see *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*, RIN 0584-AE88), program changes (the establishment of a rural non-congregate option for SFSP and SSO; see *Implementing Provisions From the Consolidated Appropriations Act, 2023: Establishing the Summer EBT Program and Non-Congregate Option in the Summer Food Service Program*, RIN 0584-AE96), and a new program (Summer EBT; see *Implementing Provisions From the Consolidated Appropriations Act, 2023: Establishing the Summer EBT Program and Non-Congregate Option in the Summer Food Service Program*, RIN 0584-AE96). The survey also includes a series of questions about the Buy American Provision that appeared in previous SMO surveys so FNS can track the important information across time.

Purpose of the administrative data

The administrative data is information such as the number of program participants and the number of meals served each month. State Agencies gather this information from program providers and report it *in aggregate* (i.e., for the whole State) on form FNS-10 (which is about NSLP, SBP, and SSO), FNS-44 (which is about CACFP), and FNS-418 (which is about SFSP), (jointly approved under OMB Control Number 0584-0594, *Food Programs Reporting System*, expiration date: 9/30/2026). The SMO Study requests the *disaggregated data* (i.e., at the level of the school, outlet, or site, when possible, or at the level of the school food authority, institution, or sponsor, when not possible). FNS uses this

information to analyze complex interactions between variables reported on these forms and the survey. For example, FNS can analyze how policy changes impact program participation differently in rural versus urban sites or large versus small school food authorities.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FNS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide alternative submission of information collections. About 85% of this information collection will rely on information technology because the data collection activities (Appendices B and C1-3) and most of the participant outreach activities (Appendices D1-8) are email- or web-based.

We will send the State Agency respondents an email with a link to a web survey. This method simplifies the information collection and submission process for respondents and reduces burden in several ways:

- It reduces geographic and time constraints because respondents can access the survey from any location and at any time of the day or week.
- It provides flexibility to respondents, who can access the survey from a smartphone, tablet, laptop, or desktop computer. It also provides flexibility because the platform saves responses so respondents can leave and return to the survey as time allows.
- It is accessible to respondents who require assistive technology.
- It is programmed with skip logic so respondents answer only the questions that are relevant to them based on earlier responses.

- Professional survey support specialists are available during regular business hours to assist respondents who have questions or prefer completing the survey over the phone (although, based on previous study years, it is unlikely that any respondents will use this option).

We will also request electronic submission of administrative data. We adopted this means of collection because it simplifies the information submission process for respondents and reduces burden by providing flexibility in a few ways:

- There is not a consistent platform across State Agencies to store, manage, and access administrative data; therefore, the respondents may submit the requested data “in whatever format is easiest” (e.g., single file, multiple files, any standard file format).
- Respondents they may send the data by email or, if additional security is desired by the respondent, using the State Agency’s secure transfer platform or the study team’s secure transfer site hosted by Box.

A4. Efforts to identify duplication.

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.

Every effort has been made to avoid duplication. FNS solely monitors School Meal Operations to ensure integrity. The agency has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. The information required for data collection is currently reported to the agency on a regular basis in a standardized form. The similar data collected, does not meet the agency’s needs; therefore to reduce burden, we asked State Agencies for administrative data that they already gather. Furthermore, for this specific information collection, States will only report this data in a new format for which the agency has accounted for in the burden estimates.

FNS develops a research and evaluation plan every fiscal year. The plan reflects coordination across FNS to ensure that information collection efforts are necessary (i.e.,

meet current needs) and not duplicative. For example, FNS plans to use the SMO Study to collect information about school year 2023-24 (as reflected in this information collection request) but not school year 2024-25 because the National School Food Study (OMB Control Number 0584-0698, expiration date: 6/30/2027) will collect data about school year 2024-25 and the two efforts would be somewhat duplicative.

The information collected in the SMO Study has been carefully selected. We work closely with the Child Nutrition Program office to choose survey questions that will collect information not otherwise available to FNS. We ask State Agencies for administrative data they already gather to reduce burden. However, for this study, the States are asked to report their already-collected data in a specific format using Appendices C FNS-10 administrative data request; FNS-418 administrative data request; and FNS-44 administrative data request.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection will not impact small business or other small entities. Information being requested or required has been held to the minimum required for the intended use.

A6. Consequences of collecting the information less frequently.

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

This ongoing information collection request is mandatory under the National School Lunch Act (Appendix A), as described in response A1. If the school year 2023-24 collection is not conducted, FNS will lack State Agency insights and data about program operations during a year with major policy changes (updated meal pattern requirements for NSLP and SBP), program changes (the establishment of a rural non-congregate option for SFSP and SSO), and a new program (Summer EBT), as described in response A2. This is critical

information FNS needs to manage its Child Nutrition Programs in support of the FNS mission to provide children with access to a healthy diet.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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

- Requiring respondents to report information to the agency more often than quarterly;
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Requiring respondents to submit more than an original and two copies of any document;
- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Federal Register notice

A notice was published in the *Federal Register* on May 3, 2024 (89 FR 36750-36753), which requested public comments on or before July 2, 2024. We did not receive any public comments during this 60-day period.

Expert consultation

In February 2024, we pre-tested the new survey we developed for use in fall 2024. The pretest participants were the State CN Directors from four states that varied across relevant characteristics: Melanie B. and Sara H. from Michigan Department of Education, Kayte P. from Nebraska Department of Education, Kimberly V. from New York State Department of Education, and Chet C. from Oklahoma Department of Human Services. We emailed a pdf version of the survey to the pretest participants and instructed them to track how long it took them to complete each section of the survey, including the time needed to gather

relevant data or information, and to note any instructions or questions that were unclear or difficult to answer. We conducted 30-minute debriefing interviews with each pretest participant. The interviews focused on asking respondents to identify and share concerns about unclear questions or response options, questions that took too long to answer, burden, and the flow of the survey. The respondents said the relevant data will be available when the survey is fielded in fall 2024, the instructions were clear, and the survey was easy to understand generally (Appendix E). Respondents provided suggestions for improvements that we addressed in the final survey (Appendix B) and study support email from the FNS Regional Office (Appendix D1). In the final survey, we eliminated some questions to reduce the burden, re-ordered some questions to enable respondents to delegate sections to the appropriate staff members, and rephrased some questions to enhance clarity. In the study support email, we added that four states pre-tested the survey and recommended gathering the data ahead of time, and provided the survey questions in an attachment.

We sent this ICR to the National Agricultural Statistics Service, where it was reviewed by Doug Kilburg. He did not have any concerns with the proposed methods (Appendix H).

A9. Explain any decisions to provide any payment or gift to respondents.

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

Respondents will not receive any payments or gifts.

A10. Assurances of confidentiality provided to respondents.

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

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

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

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

The web surveys will be developed in Confirmit, a computer-assisted survey software package developed by the company of the same name, and all data will be stored securely within this system. Through Confirmit, unique user credentials (ID and Password) are created for each survey participant. Each participant will be assigned to a copy of the instrument. Access to the instrument is provided via a unique URL sent to the participant's email account. The URL will contain an embedded hashed ID and Password for the participant. When the participant clicks on the URL, they will be automatically directed to the website and authenticated into the instrument. All data captured through Confirmit, will be stored in a study-specific folder that is encrypted with AES 256-bit encryption on the Confirmit server. All access to this data is controlled by Active Directory groups on the contractor's Domain Network. Each study team member must have valid credentials to access the Confirmit data stored in restricted access folders. While none are expected, any hard-copy documents submitted will be physically secured in locked storage cabinets and shredded at the close of the study.

Personally identifiable information will not be used to retrieve survey records or data. Neither the survey nor the other data collection materials in this collection require a Privacy Act Statement. Contact information will be stored with the other study data in a restricted access project directory on a password-protected local area network and will not be shared outside the study team. This information collection request has been reviewed and cleared by FNS Privacy Officer, Deea Coleman, on 7/18/2024.

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not include any questions of a sensitive nature. This information collection request has been reviewed and cleared by FNS Privacy Officer, Deea Coleman, on 7/18/2024.

A12. Estimates of the hour burden of the collection of information.

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

The burden table below (also Appendix I) provides the estimated burden for the school year 2023-24 information collection.

We estimate that this information collection will include 68 State Agency respondents and based on prior SMO Study years we expect all will be responsive. The estimated total annual responses is 735 responses (an average of 10.8 responses per person), which includes data collection as well as participant outreach such as emails. The estimated total annual burden is 945.0 hours, which we calculated by summing estimates of the burden for

each individual data collection instrument and outreach material. The burden estimates for the data collection instruments are based on pre-testing the instruments and feedback from respondents in prior SMO Study years. The burden estimates for the outreach materials are based on the brevity of the emails and post card and on prior experience conducting the phone calls.

We estimate the annualized cost to State governments will be \$49,544.25. This estimate is based on the mean hourly wage (\$52.43) for State Government (code 999200) Education and Childcare Administrators (code 11-9030) using the May 2023 Occupational Employment and Wage Statistics from the Bureau of Labor Statistics (https://www.bls.gov/oes/current/naics4_999200.htm). When we add 33% of the estimated base annual respondent cost to represent fully loaded wages, the total annual respondent cost is \$65,893.86.

Burden Table

Respondent category	Type of respondent	Instruments	Appendix	Sample Size	Responsive					Non-Responsive					All	All
					Number of re-spondents	Frequency of re-sponse	Total Annual re-sponses	Hours per re-sponse	Annual burden (hours)	Number of non-respondents	Frequency of re-sponse	Total Annual re-sponses	Hours per re-sponse	Annual burden (hours)	Total Annual hour burden	Total annualized cost of respondent burden at an hourly rate of \$52.43
State Government	State CN Director	Study support email from FNS Regional Office to State Agency	D1	68	68	1	68	0.1	3.4	0	0	0	0	0	3.4	\$ 178.26
		Advance email	D2	68	68	1	68	0.1	3.4	0	0	0	0	0	3.4	\$ 178.26
		Study brochure	D3	68	68	1	68	0.1	3.4	0	0	0	0	0	3.4	\$ 178.26
		Survey email	D4	68	68	1	68	0.1	3.4	0	0	0	0	0	3.4	\$ 178.26
		Survey reminder email	D5	34	34	4	136	0.1	6.8	0	0	0	0	0	6.8	\$ 356.52
		Survey reminder phone script	D6	17	17	2	34	0.1	2.7	0	0	0	0	0	2.7	\$ 142.61
		Survey last chance post card	D7	8	8	1	8	0.1	0.4	0	0	0	0	0	0.4	\$ 20.97
		Admin data phone script	D8	68	68	1	68	0.3	22.4	0	0	0	0	0	22.4	\$ 1,176.53
		Web survey about SY 2023-2024	B	54	54	1	54	0.5	27.0	0	0	0	0	0	27.0	\$ 1,415.61
		Request for FY 2024 FNS-10 Administrative data	C1	55	55	1	55	6.0	330.0	0	0	0	0	0	330.0	\$ 17,301.90
		Request for FY 2024 FNS-418 Administrative data	C2	53	53	1	53	4.0	212.0	0	0	0	0	0	212.0	\$ 11,115.16
		Request for FY 2024 FNS-44 Administrative data	C3	55	55	1	55	6.0	330.0	0	0	0	0	0	330.0	\$ 17,301.90
Total				68	68	10.8	735	1.3	945.0	0	0	0	0	945.0	\$ 49,544.25	
														33% to account for fully loaded wage rate		\$ 16,349.60
														TOTAL (fully loaded)		\$ 65,893.86

A13. Estimates of other total annual cost burden.

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

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

A14. Provide estimates of annualized cost to the Federal government.

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

We estimate the total annualized cost to the Federal government is \$507,848.35.

The largest cost is \$1,406,175.20 to pay a contractor for three years of research services planning, conducting, and reporting on the SMO Study in collaboration with FNS, or \$468,725.07 annually.

We estimate the collaborating FNS Social Science Research Analyst will require 400 hours per year and their Branch Chief will require 40 hours per year for study activities. The annual cost for the Analyst is estimated to be \$26,388 (\$65.97 per hour, GS-13 Step 5, Locality of New York-Newark) and the annual cost for the Branch Chief is estimated to be \$3,028 (\$75.70 per hour, GS-14 Step 5, Locality of Washington-Baltimore-Arlington) using 2024 salary tables from the Office of Personnel Management. Adding in \$9,707.28 to account for fully loaded wages (\$29,416 x 0.33), total Federal employee costs per year are estimated to be \$39,123.28.

A15. Explanation of program changes or adjustments.

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

This is a revision of a currently approved information collection (OMB Control Number 0584-0607, expiration date: 8/31/2026). This information collection is currently approved with 11,869 estimated total annual responses and 2030.5 estimated total annual burden hours for school year 2022-2023. The revised estimates for school year 2023-2024 are 735 total annual responses and 945 total annual burden hours. This is 11,134 fewer annual responses and 1,085.5 fewer annual burden hours, which reflects that FNS will adjust this year’s study methods by not collecting information from School Food Authority respondents (1,268 respondents). The number of State agency respondents is not being adjusted (it was and is still 68 respondents).

A16. Plans for tabulation, and publication and project time schedule.

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

Study schedule

Outreach to State Agency respondents	1 week post OMB approval
Web Survey Data Collection	2 weeks post OMB approval
Administrative Data Collection	March 2025 – May 2025
Prepare Data Files	5 months following the start of data collections
Analyze Data	8 months following the start of data collections
Publication	13 months following the start of data collections

Analysis

Most analyses will produce descriptive data, including univariate statistics (means, medians, and frequencies) and cross tabulations. For select outcomes, we will test differences between key subgroups for statistical significance using two-tailed t-tests. Administrative data will be analyzed at the State, SFA, school, sponsor, site, institution and

outlet levels, if administrative data at the school, site, and outlet levels are available from State Agencies. Web survey data will be analyzed at the State Agency and regional levels, as applicable.

Publication

A full report will be published on the FNS website and study data for public use will be published on AgData Commons.

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the expiration date.

A18. Exceptions to the certification statement identified in Item 19.

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

We have no exceptions to the certification statement in 83-I item 19.