

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

2023 Pulse Survey: Operational Challenges in Child Nutrition Programs

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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.

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval under the Paperwork Reduction Act (PRA) to conduct a new survey of school food authorities (SFAs) to collect information on current operational challenges in school food service, including those related to school food procurement, program administration, and program finances.

FNS is the sole agency responsible for the administration of the CN programs—including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), NSLP Seamless Summer Option (SSO), the Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), and others—at the federal level. Although FNS oversees these programs, SFAs administer them through agreements with SFAs and other local entities that implement the programs at the local level. A previous survey administered by FNS (School Food Authority Survey II on Supply Chain Disruption and Student Participation, OMB control number 0584-0677, expiration date 05/31/2023) indicated that in the first quarter of SY 2022-2023, the vast majority of SFAs were facing supply chain-related challenges such as high cost of food and materials, staffing shortages, and product shortages, as well as challenges related to the return to standard operations following the COVID-19 public health emergency. SFAs also reported less favorable program finances in the first quarter of SY 2022-2023 compared with the previous year. Anecdotal evidence, including public comments submitted on behalf of schools participating in federal nutrition programs, indicate that food costs, labor costs, and decreases in participation continue to be areas of great concern. To inform current and future policy decisions that support effective implementation of child nutrition programs, FNS requires consistent and current information collection on these and other emerging challenges local program operators and administrators are facing as they begin SY 2023-2024.

This collection is authorized under Section 28(a)(1) of the Richard B. Russell National School

Lunch Act (NSLA), which authorizes the USDA Secretary to conduct annual national performance assessments of the school meal programs and requires States and local entities participating in the programs to cooperate with program research and evaluations (Appendix A). Furthermore, Section 305 of the 2010 Healthy Hunger-Free Kids Act (HHFKA) amended Section 28 of the NSLA by adding the following:

“(c) COOPERATION WITH PROGRAM RESEARCH AND EVALUATION.—States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts.”

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 primary purpose of this information collection is to obtain data on current operational challenges or emerging topics in child nutrition programs, including those related to school food procurement, program administration, and program finances, via the 2023 Pulse Survey: Operational Challenges in Child Nutrition Programs (Appendix B), which is a maximum 30 question web survey of all 19,050 SFAs that operate the CN Programs. In particular, the survey will provide critical nationwide information on the current state of a wide variety of issues identified in the previous year’s survey, including but not limited to school food vendor, cost, and labor issues and issues related to student participation.

FNS will use the information obtained through this survey to develop tailored resources, tools and flexibilities to support States and program operators in serving children healthy and nutritious meals. This is a mandatory collection for both States and SFAs. While the survey will only be completed by SFAs, States may be required to provide current contact information for SFAs operating within their States. FNS

will first contact SAs to provide information about the survey and to provide a Survey Support Email (Appendix C) to be distributed to the SFAs in their respective States letting SFAs know that the survey is coming and expressing their support for the collection. Shortly thereafter, FNS will email the 2023 Pulse Survey: Operational Challenges in Child Nutrition Programs (Appendix B) to all SFAs, using contact information obtained from the previous survey (SFA Survey II on School Food Supply Chain Disruptions), via the Qualtrics Survey Software platform.

FNS intends to collect data over a 6-week period. SFAs that have not yet completed their surveys will receive a reminder email (Appendix D) each week. FNS expects each SFA to receive 2 reminder emails, on average. Upon completion of the survey, FNS will send each SFA a thank you email (Appendix E). Because it is assumed the topics addressed in this survey are of great concern to SAs and SFAs and the survey provides an opportunity to communicate pressing challenges and frustrations directly to FNS, FNS expects all 19,050 SFAs to respond within this 6-week period. Note that the communications provided in Appendices C through E are samples that are likely to reflect the length and content of email communications with SAs and SFAs but are subject to change based on agency needs and any modifications required to tailor messaging.

A3. Use of information technology and burden reduction.

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

FNS is committed to complying with the E-Government Act of 2002 to promote the use of technology. The team will administer the web survey to SFAs using the Qualtrics web survey platform. Online surveys enable efficient survey participation, as programming limits questions to relevant respondents and will constrain data ranges, keeping responses within a certain length and simplifying data cleaning. Web surveys also allow respondents to complete and submit data securely using unique, password-protected logins. Respondents may save their progress, facilitating completion of the survey in

more than one session.

FNS estimates that 100% of this ICR will be collected electronically.

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.

FNS has made every effort to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. The data we seek to collect are specific to the challenges and special circumstances SAs and SFAs are currently experiencing, and to our knowledge, these data are not currently being collected elsewhere. These data build on and are distinct from the data collected in the prior SFA Survey II on Supply Chain Disruption and Student Participation in that they provide the latest information about operational challenges or other emerging issues in school nutrition programs, including but not limited to school food vendors, costs, labor issues, and issues related to student participation. These data will help FNS identify trends and develop targeted resources and support.

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.

The amount of requested information has been kept to the minimum required for its intended use. Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. FNS estimates that out of the total 19,106 respondents for this collection, 74 percent are small entities (school districts with less than 50,000 students), representing approximately 14,138 respondents.

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not

conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The ability to collect data consistently and in a timely fashion is essential for FNS to fully understand the scope and severity of current operational challenges or other emerging issues and to identify potential impacts on program operators' abilities to provide healthy and nutritious meals to students this school year. If FNS did not collect these data, FNS would not be able to provide timely, tailored resources, tools and flexibilities necessary for local program operators to continue providing reimbursable meals and snacks to children through the federal Child Nutrition Programs efficiently and effectively.

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.

1. A notice was published in the Federal Register on May 8, 2023, Volume 88, Number 88, pg. 29625 (Agency Information Collection Activities: Operational Challenges in Child Nutrition Programs Surveys) (Appendix H). Written comments responding to the information collection were requested on or before July 7, 2023. FNS received one public comment and one email communication with questions that were not germane to the survey. The public comment was submitted by the Texas Department of Agriculture, and it is included in Appendix I; the FNS response, included in Appendix J.
2. The survey plan supporting documentation has been reviewed by Peter Quan, Sampling and Frames Development Section in the National Agricultural Statistics Service. Questions posed during this review and answers provided by FNS are included in Appendix K.
3. The following individuals representing SFAs in the respondent population have been consulted regarding burden estimates and other characteristics associated with this data collection: Becky Hardin, Cafeteria Director at Rosary Catholic School, Oklahoma (cafeteria@rosaryschool.com); Brigitte Clark, District Clerk at Geraldine Public Schools, Montana (bridgettec@geraldine.k12.mt.us); and Dawn Smith, Director of Food and Nutrition at School District

of Beloit, Wisconsin (dsmith7@sdb.k12.wi.us). In addition to participating in the pretest of survey questions in August-September 2022, these individuals provided feedback confirming the accuracy of the survey burden estimate: each respondent reported that the survey took between 15-20 minutes to complete. These individuals also provided feedback on the clarity of instructions and ease of survey access and use. It was recommended that the survey instructions notify respondents that the survey contains questions about SFA financial status, in the event that the respondent may want to have access to financial records for survey completion. The remaining feedback was largely positive.

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.

No payments or gifts are provided to respondents under this collection.

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 Department complies with the Privacy Act of 1974. No confidential information is associated with this collection of information and no such assurances of confidentiality are provided. This ICR does not request any personally identifiable information nor does it contain any forms that require a Privacy Act Statement. The ICR was reviewed by Wilson Moorer on August 8, 2023, and there were no privacy comments or concerns provided.

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.

No private or sensitive questions will be asked. The ICR was reviewed by Wilson Moorer on August 8, 2023, and there were no privacy comments or concerns provided.

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.

This is a new information collection request. With this submission, there are 19,106 respondents, 95,306 responses, and 8,833.30 burden hours. The average number of responses per respondent is 4.988. Table 2, Annual Burden Estimate, and Appendix G show the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials, affected stakeholders, and prior experience in collecting similar data.

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

The estimates of annualized costs to State and local governments and private, not for profit businesses are based on the burden estimates and utilize the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational and Wage Statistics for Occupational Groups 999200: State Government (https://www.bls.gov/oes/current/naics4_999200.htm) and 611000: Elementary and Secondary Schools (http://www.bls.gov/oes/current/naics4_611100.htm). Annualized costs are based on the mean hourly wage. The estimated annualized cost for State government, which includes State CN Directors (Occupation Code 11-9030, Education and Childcare Administrators), is \$476.56 (\$51.05/hr. x 9.34 hours). The estimated cost of this data collection for local government, which includes SFA directors in public

schools (Occupation Code 11-9039, Education Administrators, All Other), is \$348,078.58 (\$48.02/hr. x 7,248.61 hours). The estimated cost of this data collection for private, not for profit businesses, which includes SFA directors in private schools (Occupation Code 11-9039, Education Administrators, All Other), is \$75,647.98 (\$48.02/hour x 1,575.34 hours). Including an additional \$139,987.03 to account for fully loaded wage rates (\$424,203.12x 0.33), the estimated annualized total cost to respondents associated with this collection is \$564,190.15.

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.

The total annualized cost to the Federal government is \$411,233. The largest cost to the Federal Government is to pay a contractor \$395,421 for labor and direct and indirect costs to collect and analyze the data over a period of performance which is less than 12 months. The total annualized cost also includes \$15,812 for a total of 200 hours annually of Federal employee time—100 hours for a GS-13, Step 2 at \$55.46 per hour for a total of \$5,546 and 100 hours for a GS-14, Step 1 at \$63.43 per hour for a total of \$6,343—plus \$3,923 to account for fully loaded wages (\$11,889 x 0.33). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2023 for the Washington, DC locality (Office of Personnel Management. 2023. Salary table 2023-GS. Retrieved from <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/>

[DCB h.pdf](#)).

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 submission is a new information collection request as a result of program changes and will add 8,833.30 hours of burden to OMB's inventory attributable to 95,306 total annual responses.

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.

Plans for publication have not yet been determined. The project schedule is as follows:

Prepare SFA Contact Information	Immediately following OMB approval
Collect SFA survey data	January 16 – February 27
Analyze and share survey data with federal partners	February 28 – June 28

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.

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

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."

FNS does not have any exceptions to the certification statement.