



Food and Nutrition Service

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Food and Nutrition Service (FNS)

DATE: November 21, 2024

SUBJECT: Justification for change in survey content approved under OMB Control No: 0584-0689, "2023 Pulse Survey: Operational Challenges in Child Nutrition Programs."

The Food and Nutrition Service (FNS) is requesting non-substantive changes to the Pulse Survey: Operational Challenges in Child Nutrition Programs, approved under OMB Control No. 0584-0689; expiration date of December 31, 2026. Through this memorandum, we are requesting approval for the following non-substantive changes to the survey content:

- 1. Update dates to reflect current school year and information collection needs.**
- 2. Remove questions response options that did not produce high-quality data.**
- 3. Remove questions that are no longer needed for information collection purposes.**
- 4. Add questions and responses based on FNS Child Nutrition Program feedback.**

These changes do not ask respondents to submit any new or additional documentation to FNS. The estimated time for respondents to complete the survey, as well as the estimated time for State agencies to communicate instructions to respondents, is not impacted by these changes. As with the previous survey, FNS estimates it will take each respondent approximately 20 minutes to complete.

Change #1: Update dates to reflect current school year and information collection needs.

This primarily involved updating references to the prior school year (SY 2023-2024) to reflect the current school year (SY 2024-2025). In some cases, references to the previous school year at the time of the survey (SY 2022-2023) have been updated to reference the previous school year at the time of the forthcoming survey (SY 2023-2024). This applies to all questions with dates.

Change #2: Remove questions response options that did not produce high-quality data.

These question responses were removed because they did not yield useful data, or the data they did yield proved unreliable and could not be validated. This applies to questions 2.b and 2.d in the original survey.

Change #3: Remove questions that are no longer needed for information collection purposes.

These questions were removed because FNS either felt the data collected in previous surveys was sufficient or the value of new data was not great enough to justify the burden of response. Topics addressed in removed questions include estimated percentage change in food costs, labor costs, and student participation; extent of incomplete orders with missing or substituted items; vendor participation in school food service; food distributors and forecasting; and Supply Chain Assistance funds. This applies to questions 4, 11, 13, 15, 17-20, and 25-28 in the original survey.

Change #4: Add questions and responses based on FNS Child Nutrition Program feedback.

Questions and response options were added to address current data collection needs, as recommended by the FNS Child Nutrition Program office. Topics addressed in new questions include exceptions to the newly enacted Buy American provision, including both the food product for which an exception was requested, and the reason an exception was requested for that food product. Although these questions are new to this survey vehicle, they do not require pretesting or clearance, as they were pulled from the School Meal Operations Study (OMB Clearance 0584-0607) in the State Agency Child Nutrition Director Survey (School Year 2023-2024). This applies to questions 18-24, 26.d, 26.f, and 26.i in the updated survey.

Changes were made only to Appendix B_2023 CN Pulse Survey. This document identified by “Change” in the title is attached.

The only changes we anticipate making in any of the other attachments are changes in date to reflect the current school year.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.

Attachments:

- Appendix B_2024 CN Pulse Survey_Changes