2024–2025 National School Foods Study

OMB Supporting Statement
Part B

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PART B. STATISTICAL METHODS

The 2024–2025 National School Foods Study (hereafter referred to as "the study") includes three components: the second School Nutrition and Meal Cost Study (SNMCS-II), the fourth School Food Purchase Study (SFPS-IV), and an updated evaluation of the Fresh Fruit and Vegetable Program (FFVP). A key goal of the study is minimizing data collection costs and respondent burden while facilitating comparisons within and across the three study components (SNMCS-II, SFPS-IV, and FFVP). The sampling plan will provide nationally representative estimates of school food authorities (SFAs), schools, students (and their parents), and meals in SY 2024–2025. In addition, the sample is designed to lead to estimates that are as comparable as possible with the estimates from SNMCS-I (OMB Control Number 0584-0596, expired 07/31/2017), SFPS-III (OMB Control Number 0584-0471, expired 3/31/2012), and, to a certain extent, FFVP-I (OMB Control Number 0584-0556, expired 06/15/2010) with the required levels of statistical precision. It is also designed to incorporate the Outlying Areas component (Alaska, Guam, Hawaii, Puerto Rico, and USVI) as part of the SNMCS-II study component. Two expanding policy-relevant subgroups are also incorporated into the design: SFAs and schools that are in States with funded Healthy School Meals for All (HSMFA, formerly referred to as Universal School Meals) programs and those that participate in the Community Eligibility Provision (CEP) option.

B.1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the

universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The universe for SNMCS-II includes public school and charter-only SFAs (SFAs that serve only charter schools) in the contiguous 48 States and the District of Columbia plus five States and Territories in the Outlying Areas. SFPS-IV includes only public school SFAs in the contiguous 48 States and the District of Columbia. The FFVP evaluation starts with a sample of SFAs (in the 48 contiguous States plus the District of Columbia) that have at least one elementary school participating in that program.

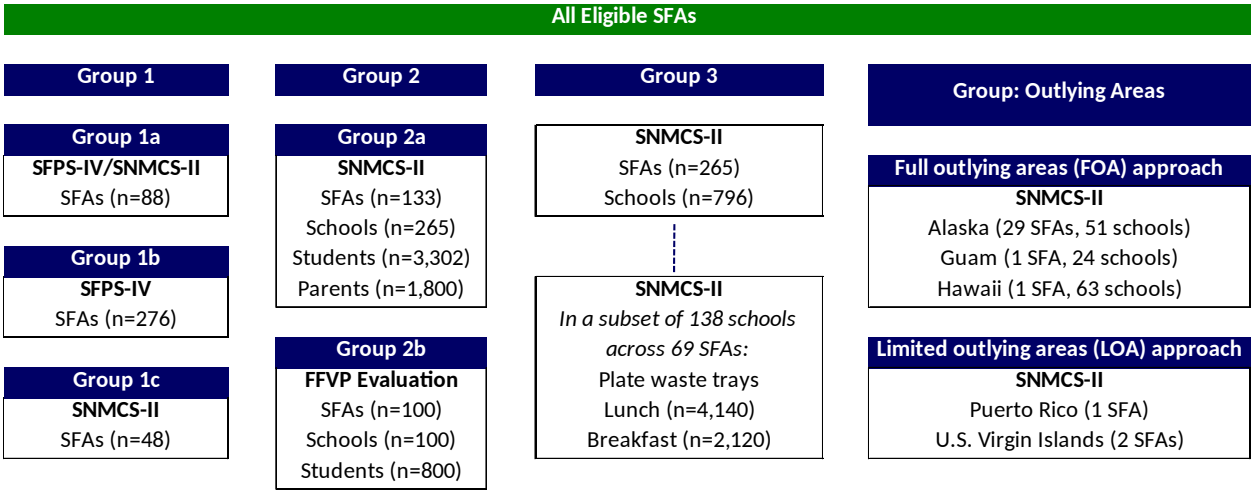
Selecting the samples requires high-quality sampling frames at each stage. The SFA sampling frame for the SNMCS and SFPS study components will be constructed by combining the most recent data from the SFA Verification Collection Report (FNS-742), the U.S. Department of Education's (ED) Common Core of Data (CCD) "Local Education Agency (LEA or school district) Universe Survey" collected annually by the ED's National Center for Education Statistics, and a Census file from the Small Area Income and Poverty Estimates Program with school district–level estimates of school-age children in poverty. As there is no unique identifier to easily link these files, we will use linkage methods to do so. To select the FFVP SFAs, we will obtain from FNS a list of elementary schools participating in the FFVP in 2023–2024 and deduplicate it to generate an SFA- level file for sampling.

The study sample is designed to yield data from 810 SFAs, 1,061 schools, and 3,302 students, and 1,800 parents. In addition, the study will collect plate waste data to yield a sample of 4,140 reimbursable lunch trays and

2,120 reimbursable breakfast trays. For the SNMCS (Mainland) and SFPS components, the universe of SFAs will be randomly divided into three mutually exclusive sampling groups each serving different study objectives. SFAs sampled in Group 1 will participate only at the SFA level and will provide data for both the SNMCS-II and the SFPS-IV. SFA-, school-, and student-level data will be collected from sampled SFAs assigned to Group 2a and will provide data for the SNMCS-II. Sampled SFAs assigned to Group 3 will provide school data, and a random subset will provide plate waste data for both lunches and breakfast–all for the SNMCS-II. Group 2b SFAs will be selected from a separate (overlapping) sampling frame that will be derived from a list of all elementary schools participating in the FFVP. The very large SFAs (referred to as the "certainty" SFAs) are included in Groups 1a, 2a, and 3 (and in 2b if they include at least one FFVP elementary school). The Outlying Areas sample will provide data to support the SNMCS-II only. For Puerto Rico and U.S. Virgin Islands (USVI), we will do a more limited data collection at the SFA level only, including all three SFAs in these two Territories.

Figure B.1 provides an overview of the sample design. The full sample design can be found in Appendix L.

Figure B.1. Summary of the sample design



Notes: Sample sizes show target number of completes.

Each of the certainty SFAs will be included in Groups 1a, 2a, 2b (if they have at least one FFVP school), and 3. They will participate in all data collection activities for these groups.

FFVP = Fresh Fruit and Vegetable Program; SFA = school food authority; SFPS = School Food Purchase Study; SNMCS= School Nutrition and Meal Cost Study.

B.1.1. Mainland study: Contiguous 48 States and DC

The sampling frame for selecting schools within sampled SFAs will be the most recent available CCD school-level file. The CCD file contains more detailed information than the FNS-742 and has information that allows the elimination of some types of ineligible schools (such as charter schools and those serving institutional populations). The CCD file also contains enrollment figures, grades served, and demographic information that may be useful for stratification or weighting. For the FFVP school sample, we will use the FNS-provided list of schools offering the FFVP to sample one participating school per sampled SFA. The sampling frames for students will be lists of enrolled students obtained from sampled schools.

From the universe of SFAs in the contiguous 48 States and DC, we will select nationally representative samples that provide unbiased and precise estimates at each level of analysis (SFAs, schools, students [and their

parents], and meals) for the population and unbiased and precise estimates for key subgroups. Key subgroups will be defined by SFA and school size (enrollment), HSMFA and CEP status of school, poverty level, urbanicity, FNS region, school type (elementary, middle, high), and school meal participants and nonparticipants.

The estimated size of the respondent universe, along with target completed sample sizes and previous response rates, are presented in Tables B.1.1, B.1.2, and B.1.3.

Table B.1.1. Respondent universe for SNMCS-II component and expected and SNMCS-I response rates

Sample group	Estimated size of respondent universe	Initial sample	Target Complete	Expected response rate (%)[a]	SNMCS-I response rate (%)[b,c]
States	49	49	47	96	n.a.
Public SFAs	14,675	887[d]	522[e]	60[d]	82
Schools (K–12)	92,714	1,117	1,061	95[d]	94
Enrolled students (within schools participating in the National School Lunch Program)	48,719,713	6,604	3,302	50	43
Parents and guardians of enrolled students	83,026,207	3,302	1,800	55	86
Total	131,853,358	11,959	6,732	16[g]	29[g]

Source: Common Core of Data file (CCD) 2017–2018 for the school and student counts and SFA Verification Collection Report (FNS-742), school year 2018–2019 for the SFA counts. These counts will be updated at the time of sampling using the latest versions of both the FNS-742 file and the CCD file. Zeidman et al. (2019)[1] for the SNMCS-I weighted response rates.

Notes: Expected response rates reflect the percentage of eligible SFAs, schools, students, or parents/guardians.
n.a. = not applicable.

[a] Calculated by dividing the target number of completes by the initial sample.

[b] Expected response rates reflect the percentage of eligible SFAs, schools, students, or parents/guardians.

[c] All sample groups are asked to participate in multiple data collection activities for SNMCS-II. The reported response rate from SNMCS-I reflects the primary data collection activity for the sample group. For SFAs, this is the SFA Director Survey; for schools, the Menu Survey; for students, the Student Interview; for parents, the Parent Interview.

[d] Does not include the Outlying Areas, for comparability with SNMCS-I.

[e] The certainty SFAs are included in Groups 1a, 2a, and 3 but are only counted once to get a unique number of SFAs equal to 522.

[f] This estimate assumes approximately 70 percent of children are in two-parent households.[2]

[g] The overall response rates were estimated by multiplying the expected and prior response rates for the SFAs, schools, students, and parents.

[1] Zeidman, E., N. Beyler, E. Gearan, N. Morrison, K. Niland, L. Washburn, B. Carlson, D. Judkins, L. LeClair, M. Mendelson, T. Wommack, J. Carnagey, M. Murphy, and A. Williamson. "School Nutrition and Meal Cost Study: Study Design, Sampling, and Data Collection." U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support.

[2] Census.gov. "Historical Living Arrangements of Children." November 2023. https://www.census.gov/data/tables/time-series/demo/families/children.html.

Table B.1.2. Respondent universe for SFPS-IV component and expected and SFPS-III response rates

Sample group	Estimated size of respondent universe	Initial sample	Target Complete	Expected response rate (%)	SFPS-III response rate, (%)[a]
States	49	49	49	100	n.a.
Public SFAs	12,635	683	364	53	67

Source: SFA Verification Collection Report (FNS-742), school year 2018–2019 for the SFA counts. SFPS-III response rates reported in the School Food Purchase Study-III Final Report, March 2012.[3]

Notes:

n.a. = not applicable.

[a] SFAs are asked to participate in multiple data collection activities for SFPS-IV. The reported response rate from SFPS-III reflects the completion of both the procurement practices and food purchase surveys. For this study, these components together are analogous to completion of the SFA Director Survey (SFPS-IV component) and Quarterly Program Data Form and Food Purchase Request.

Table B.1.3. Respondent universe for FFVP evaluation component and expected and FFVP-I response rates

Sample group	Estimated size of respondent universe	Initial sample	Target Complete	Expected response rate (%)	FFVP-I response rate(%)
Public SFAs	See note	159	100	63	Not reported[a]
Schools (K–12)	7,499	111	100	90	86[b]
Enrolled students (within schools participating in the FFVP)	2,417,338	1,600	800	50	80[c]
Total	2,424,837	1,870	1,000	45[d]	69[d]

Source: FFVP respondent universe is estimated based on data reported in the School Meals Operations Study, State Agency Survey, SY 2022–2023. FFVP-I response rates are from the Evaluation of the Fresh Fruit and Vegetable Program (FFVP) Final Evaluation Report, March 2013.[4]

Notes: Note that the size of the SFA respondent universe participating in FFVP is currently unknown at the national level but will be generated as part of the frame development process for the FFVP evaluation component, using data from States that are administering the program.

Expected response rates reflect the percentage of eligible SFAs, schools, or students. Students are eligible if the student was present at school on the target day and case was pursued (that is, not part of unattempted backup student sample).

[a] There is no response rate from the FFVP Final Evaluation Report that is comparable for the current study, which includes no SFA-level data collection. The expected response rate reflects eligible SFAs recruited for the study. The prior FFVP evaluation reported an 88 percent response rate for the district-level data of the SFA Director Web Survey and an 86 percent response rate for the school-level data of the SFA Director Web Survey.

[b] The reported response rate for schools reflects the percentage of schools that agreed to participate in the study, excluding the schools that were found to be ineligible for the study.

[c] The reported response rate for the enrolled students reflects the number of students who completed both the student survey and 24-hour dietary recall.

[d] The overall response rates were estimated by multiplying the expected and prior response rates for schools and students.

[3] U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis. "School Food Purchase Study-III," by Nick Young et al. Project Officer: John R. Endahl. USDA, March 2012.

[4] Bartlett S., L. Olsho, K. L. Patlan, M. Blocklin, and J. Klerman, et al. "Evaluation of the Fresh Fruit and Vegetable Program (FFVP)." Prepared by Abt Associates under contract no. AG-3198-D-09-0053. U.S. Department of Agriculture, Food and Nutrition Service, 2013.

B.1.2. Outlying Areas Component: Alaska, Guam, Hawái, Puerto Rico, and USVI

The Outlying Areas component respondent universe includes public SFAs and schools in Alaska, Guam, Hawaii, Puerto Rico, and USVI. The universe will be based on the combined FNS-742 and CCD. The estimated size of the respondent universe, along with the target completed sample sizes, is in Table B.1.4.

Table B.1.4. Respondent universe and sampling plan for each Outlying Area

	Full Outlying Areas approach (Alaska, Guam, Hawaii)				Limited Outlying Areas approach (Puerto Rico, U.S. Virgin Islands)			
Sample group	Estimated size of respondent universe	Initial sample	Expected response rate (%)	Target Complete	Estimated size of respondent universe	Initial sample	Expected response rate (%)	Target Complete
Public SFAs	45	34	91	31	3	3	100	3
Schools (K–12)	727	242	57	138	--	--	--	--

Source: Simulations from the 2018–2019 FNS-742 file and 2017–2018 CCD file, with some data coming from the 2016–2017 CCD file except for sample sizes for Puerto Rico and USVI. The numbers in the table will be updated during sampling, using the most recent data available.

B.2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

B.2.1. Statistical methodology for stratification and sample selection

The sampling plan is shown in detail in Appendix L. The sampling plan will provide nationally representative estimates of SFAs, schools, students (and their parents), and meals in SY 2024-2025. In addition, the sample is designed to lead to estimates that are as comparable as possible with the estimates from SNMCS-I, SFPS-III, and, to a certain extent, FFVP-I, with the required levels of statistical precision. It is also designed to incorporate the

Outlying Areas (Alaska, Guam, Hawaii, Puerto Rico, and USVI) as part of the SNMCS-II study component. Two expanding policy-relevant subgroups are also incorporated into the design: SFAs and schools that are in States with Healthy School Meals for All (formerly referred to as Universal School Meals) and those that participate in the CEP option.

B.2.2. Estimation procedure

The weights will account for the probabilities of selection and observed differential response rates across various subgroups. We will also post-stratify weights so that they total benchmarks obtained from the most recent CCD and FNS-742 data by school-level characteristics. We will identify the specific variables used for post-stratification in consultation with FNS. However, potential post-stratification benchmark counts for both levels (SFA and school) could include attributes associated with the geographic location and characteristics of the SFA and school (such as FNS region and urbanicity), categorical representations of SFA and school size, and number of CEP schools, number of each school type (elementary, middle, and high), and categories for the percentage of students approved for free or reduced-price meals. Detailed descriptions of the weighting are also provided in Appendix L.

For all samples in this study, standard errors of estimates must account for the complex sample design. When making estimates, we will use statistical software that accounts for the sample design, using appropriate techniques to estimate the standard errors.

B.2.3. Degree of accuracy needed for the purpose described in justification

This section presents the design effects and expected precision levels for SFA-, school-, and student-level estimates based on the target completed sample sizes for SNMCS-II and SFPS-IV. Table B.2.1 lists the expected design effects for the SFAs for both study components and for the FFVP evaluation component.

Table B.2.1. Average SFA and school-level design effects and completed sample sizes

Study	Sampling unit	Average design effect (deff)	Sample size	Source
SFPS-IV	SFA	1.26	364	Groups 1a and 1b
SNMCS-II	SFA	1.38	522[a]	Groups 1a, 1c, 2a, and 3
	School	2.23	796	Group 3
	School	2.83	1,061	Groups 2a and 3
	Student	5.20	3,302	Group 2a
	Parent	5.20	1,800	Group 2a
	Lunch/breakfast	5.00	4,140/2,120	Group 3
FFVP evaluation	School	1.20	100	Group 2b
	Student	2.50	800	Group 2b

[a] The certainty SFAs are included in Groups 1a, 2a, and 3 but are counted only once to get a unique number of SFAs equal to 522.

The sample size of 364 SFAs for SFPS-IV was designed to meet the precision of national estimates for population proportions of 50 percent and a difference of ±5 percentage points with a 90 percent confidence level for the overall estimates. This sample reflects the precision losses from using a complex design (e.g., unequal weighting and stratification of SFAs in Groups 1a and 1b). This sample size meets the precision target for a subpopulation of at least 25 percent of the total population with a proportion of 30 percent and a difference of ±10 percentage points with a 90 percent confidence level, shown in Table B.2.2.

Table B.2.2. Expected precision levels for SFA-level estimates for SFPS-IV

Subgroups	Target completed sample sizes	90 percent CI half interval (percentage points)
Number of schools		
1–2[a]	125	7.6
3–4[a]	110	8.1
5 or more[a]	129	7.4
Number of students		
1–350	89	9.0
351–1,200[a]	105	8.3
More than 1,200[a]	170	6.5
Urbanicity		
Urban[a]	140	7.2

Subgroups	Target completed sample sizes	90 percent CI half interval (percentage points)
Rural[a]	224	5.6
Percentage of students in poverty		
0 –17 percent[a]	117	7.8
17–35 percent[a]	207	5.9
More than 35 percent	39	13.5
FNS Region		
Mid-Atlantic	34	14.5
Midwest[a]	76	9.7
Mountain Plains	51	11.8
Northeast	40	13.3
Southeast	47	12.3
Southwest	64	10.6
West	51	11.8
Percentage of students approved for free/reduced-price meals		
0–45 percent	221	5.7
46–63 percent	84	9.2
64 percent or more	59	11.1
HSMFA/CEP status[b]		
SFAs in HSMFA States	76	9.7
Non-HSMFA SFAs with all CEP schools	110	8.1
All other SFAs[a]	178	6.3
Total	**364**	**4.4**

Source: Simulations from the first iteration of SNMCS-II, using the 2018–2019 FNS-742 file and 2017–2018 CCD file, with some data coming from the 2016–2017 CCD file.

Notes: Confidence intervals (CI) are based on a 30 percent outcome. Charter SFAs are excluded from Objective 5.

[a] Subgroup represents 25 percent or more of the population.

[b] Nine states (California, Colorado, Maine, Massachusetts, Michigan, Minnesota, Nevada, New Mexico, and Vermont) currently have HSMFA; eight have permanent policies.[5] We will update our estimates if this number changes before school year 2024-2025.

CEP = Community Eligibility Provision; CI = confidence interval; HSMFA = Healthy School Meals for All; SFA = school food authority

The sample size of 100 elementary schools participating in the FFVP evaluation component was designed to meet the precision of national estimates for population proportions of 30 percent and a difference of ±10 percentage points with a 95 percent confidence level for schools. The eight participating students per school will yield precision of ±5 percentage points.

[5] Food Research and Action Center. "Healthy School Meals for All." https://frac.org/healthy-school-meals-for-all. Accessed January 30, 2024.

These precision estimates assume a design effect of 1.2 at the school level and 2.5 at the student level.

The expected SFA-level precision levels for SNMCS-I are shown in Table B.2.3 with the 95 percent confidence interval (CI) for 522 SFAs for a 30 percent population characteristic for SFA-level estimates for each subgroup, which is typical of outcomes observed in SNMCS-I. Precision calculations assuming a more conservative 50 percent population characteristic (not shown) are a bit larger but still within the desired precision for subgroup estimates of at least 25 percent of the population for nearly all subgroups. As shown, the sample design results in an expected precision level of ±4.6 percentage points for the overall sample of 522 SFAs and achieves precision levels of ±10 percentage points (or better) for any subgroups that make up 25 percent or more of the population. Based on results from SNMCS-I, the SNMCS-II study plan estimated (not shown) the average design effect of 1.38 from the probability proportion to size selection and the expected nonresponse adjustments for SFA-level estimates.

Table B.2.3. Expected precision levels for SFA-level estimates for SNMCS-II

Subgroups	Target completed sample sizes	95% CI half interval (percentage points)
Number of schools		
1–2[a]	168	8.8
3–4[a]	148	9.4
5 or more[a]	174	8.7
Number of students		
1–350	121	10.0
351–1,200[a]	142	9.3
More than 1,200[a]	231	7.3
Urbanicity		
Urban[a]	205	7.7
Rural[a]	329	6.1
Percentage of students in poverty[b]		
0–17 percent[a]	170	8.5
17–35 percent[a]	300	6.4
More than 35 percent	57	14.6
FNS region		
Mid-Atlantic	50	15.6
Midwest	112	10.4
Mountain Plains	75	12.8
Northeast	59	14.3
Southeast	69	13.3
Southwest	93	11.4
West	75	12.8
Charter SFA		
Yes	48	15.9
Percentage of students approved for free/reduced-price meals		
0–45 percent[a]	325	6.1
46–63 percent	123	10.0
64 percent or more	80	11.9
HSMFA/CEP status[c]		
SFAs in HSMFA States	112	10.0
Non-HSMFA SFAs with all CEP schools[a]	161	8.3
All other SFAs[a]	261	6.5
Total	**534[d]**	**4.6**

Source: Simulations from the first iteration of SNMCS-II, using the 2018–2019 FNS-742 file and 2017–2018 CCD file, with some data coming from the 2016–2017 CCD file.

Note: Confidence intervals are based on a 30 percent outcome.

[a] Subgroup represents 25 percent or more of the population.

[b] The percentage of students-living-in-poverty variable has a considerable amount of missing data; the totals here reflect the nonmissing cases.

[c] The simulations in the SNMCS-II study plan did not include SFAs with other universal free-meal provisions in the CEP SFA group.

[d] Total equals 534 because it includes the certainty SFAs in Groups 1a, 2a, and 3.

CEP = Community Eligibility Provision; HSMFA = Healthy School Meals for All; SFA = school food authority.

The expected precision levels for school-level estimates for Groups 2a and 3 are presented in Table B.2.4. For the sample of 1,061 schools (Groups 2a and 3 combined) that will complete the Menu Survey, SNM Survey, and Principal Survey, the expected precision level for a 30 percent population characteristic is ±4.6 percentage points for the overall sample and ±10 percentage points (or better) for any subgroups that make up 25 percent or more of the population. We also show in Table B.2.4 an expected precision level of ± 4.8 percentage points for the overall sample of 796 Group 3 schools that will be included in the study of meal costs and school food service revenues and precision levels of ±10 percentage points (or better) for any subgroups that make up 25 percent or more of the population.

Table B.2.4. Expected precision levels for school-level estimates

Subgroups	Groups 2a and 3 combined		Group 3 only	
	Target completed sample sizes	CI half interval (percentage points)	Target completed sample sizes	CI half interval (percentage points)
School type				
Elementary[a]	487	6.8	358	8.0
Middle	241	9.7	188	11.0
High	332	8.3	249	9.6
Urbanicity				
Urban[a]	409	7.5	317	8.5
Rural[a]	653	5.9	479	6.9
Racial/ethnic distribution of students (mean %)				
Non-Hispanic Black	111	14.3	83	16.6
Non-Hispanic White	663	5.9	495	6.8
Hispanic	189	11.0	136	13.0
Other	98	15.2	82	16.7
Students approved for free/reduced-price meals				
0–45 percent[a]	384	7.7	283	9.0
46–63 percent[a]	294	8.8	232	9.9
64 percent or more[a]	383	7.7	281	9.0
FNS region				
Mid-Atlantic	87	16.2	60	19.5

Subgroups	Groups 2a and 3 combined		Group 3 only	
	Target completed sample sizes	CI half interval (percentage points)	Target completed sample sizes	CI half interval (percentage points)
Midwest	226	10.0	179	11.3
Mountain Plains	148	12.4	108	14.5
Northeast	112	14.3	85	16.4
Southeast	167	11.7	128	13.4
Southwest	189	11.0	142	12.7
West	132	13.1	94	15.6
HSMFA/CEP status of school[b]				
Schools in HSMFA States	227	10.0	170	10.3
Non-HSMFA CEP schools[a]	319	8.5	239	8.7
All other schools[a]	516	6.7	387	6.8
Total	**1,061**	**5.1**	**796**	**5.2**

Source: Simulations from the first iteration of SNMCS-II, using the 2018–2019 FNS-742 file and 2017–2018 CCD file, with some data coming from the 2016–2017 CCD file. The numbers in the table will be updated during sampling using the most recent data available.

Notes: Confidence intervals are based on a 30 percent outcome. The level of precision for school estimates for the combined Group 2a and Group 3 samples is only slightly better than that for the Group 3 sample alone. This is because combining the two samples introduces an additional design effect at a final value of 2.48 relative to the design effect of 1.95 for the Group 3 sample alone (which incorporates the SFA design effect of 1.38). This phenomenon is a necessary consequence of meeting the sometimes competing precision requirements for each survey objective and the associated study components.

[a] Subgroup represents 25 percent or more of the population.

[b] CEP schools are drawn from both the all-CEP SFA stratum and the not-all CEP SFA stratum. The simulations in the SNMCS-II study plan did not include SFAs with other universal free-meal provisions in the CEP SFA group.

CEP = Community Eligibility Provision; HSMFA = Healthy School Meals for All.

Using the SNMCS-I meal cost data, the SNMCS-II study plan estimated that, for a school-based cost estimate of the national average meal cost of $2.36 (averaged over schools and accounting for the selection of SFAs) with a standard deviation of $0.98, the precision would be ± $0.105. The average design effect is estimated to be 2.23 in Group 3 and 2.83 in Groups 2a and 3 combined with the weighting adjustments described later in this chapter.

Table B.2.5 presents the expected precision levels for the student- and parent-level estimates in Group 2a and the tray-level estimates in Group 3. As shown, the sample design results in an expected precision level of ±3.9 percentage points (for a 50 percent population characteristic) for the overall

sample of 3,302 completed student interviews in Group 2a and expected precision levels of ±10 percentage points (or better) for any subgroups that make up 25 percent or more of the population (for a 30 percent population characteristic). For the parent interviews, the sample design results in an expected precision level of ±5.3 percentage points (for a 50 percent population characteristic) for the overall sample of 1,800 completed interviews in Group 2a and expected precision levels of ±10 percentage points (or better) for any subgroups that make up 25 percent or more of the population (for a 30 percent population characteristic).

For the plate waste observations in Group 3, the expected precision levels are ±3.4 and ±4.8 percentage points, respectively, for the overall samples of 4,140 lunch trays and 2,120 breakfast trays. Expected precision levels are ±10 percentage points (or better) for any subgroup representing 25 percent or more of the population.

Table B.2.5. Expected precision levels for student- and tray-level estimates for Groups 2a and 3

Subgroups	Group 2a students		Group 2a parents		Group 3 plate waste observations			
					Lunch		Breakfast	
	Target completed sample sizes	CI half interval (percentage points)	Target completed sample sizes	CI half interval (percentage points)	Target completed sample sizes	CI half interval (percentage points)	Target completed sample sizes	CI half interval (percentage points)
School type								
Elementary[a]	1,549	5.2	844	7.0	1,456	5.8	745	8.4
Middle	754	7.5	411	10.1	1,365	6.0	700	8.6
High[a]	1,000	6.5	545	8.8	1,318	6.1	675	8.8
Urbanicity								
Urban[a]	2,154	4.4	1,174	6.0	2,451	4.4	1,256	6.7
Rural[a]	1,148	6.0	626	8.2	1,689	5.4	864	7.3
Race/ethnicity								
Non-Hispanic Black	391	10.4	213	14.0	544	9.0	279	11.0

Non-Hispanic White[a]	2,166	4.4	1,181	6.0	2,808	4.0	1,440	4.9
Hispanic	557	8.7	303	11.8	634	8.3	325	10.2
Approved for free/reduced-price meals								
Yes[a]	1,966	4.6	1,072	6.3	2,300	4.6	943	6.7
No[a]	1,336	5.6	728	7.6	1,840	5.1	1,177	7.3
FNS region								
Mid-Atlantic	337	11.2	184	15.1	332	12.1	170	17.0
Midwest	585	8.5	319	11.5	891	7.3	456	10.4
Mountain Plains	491	9.2	268	12.5	257	13.7	132	19.3
Northeast	343	11.1	187	15.0	421	10.7	216	15.1
Southeast	501	9.2	273	12.4	990	7.0	506	9.8
Southwest	587	8.5	320	11.4	692	8.4	355	11.7
West	458	9.6	250	13.0	557	9.3	285	13.1
HSMFA/CEP status of school[b]								
Schools in HSMFA States (regardless of CEP status)	706	7.7	385	10.4	884	6.9	453	9.6
Non-HSMFA CEP schools[a]	991	6.5	540	8.8	1,242	5.8	636	8.1
All other schools[a]	1,605	5.1	875	6.9	2,013	4.6	1,031	6.4
Total	**3,302**	**3.9**	**1,800**	**5.3**	**4,140**	**3.4**	**2,120**	**4.8**

Source: Simulations from the first iteration of SNMCS-II, using the 2018–2019 FNS-742 file and 2017–2018 CCD file, with some data coming from the 2016–2017 CCD file. The numbers in the table will be updated during sampling using the most recent data available.

Note: Confidence intervals are based on a 30 percent outcome.

[a] Subgroup represents 25 percent or more of the population.

[b] CEP schools are drawn from both the all-CEP SFA stratum and the not-all CEP SFA stratum. The simulations from the SNMCS-II study plan did not include SFAs with other universal free-meal provisions in the CEP SFA group.

CEP = Community Eligibility Provision; HSMFA = Healthy School Meals for All.

The minimum detectable differences (MDDs) for school- and student-level comparisons between Group 2a and 2b fare presented in Table B.2.6 for a population outcome of 0.30. Because the sample design does not oversample non-FFVP schools and students in Group 2a, the MDDs presented

are based on an estimate that about half the elementary schools in the Group 2a sample will not be participating in FFVP.

Table B.2.6. Estimated minimum detectable differences for school- and student- level comparisons for FFVP for a population outcome of 0.30.

	FFVP (Group 2b) (percentage points)	Non-FFVP (Group 2a) (percentage points)
Elementary Schools		
Sample Size	100	65
Design Effect	1.2	2.8
MDD (Group 2b to 2a)	0.302	
Elementary Students		
Sample Size	800	511
Design Effect	2.5	5.2
MDD (Group 2b to 2a)	0.148	

Note: This assumes 80 percent power and a type I error rate of 0.05.

B.2.4. Unusual problems requiring specialized sampling procedures

There are no sampling problems that we consider to be unusual in nature, and the sampling methods are described in detail in the previous sections and Appendix L.

B.2.5. Any use of periodic data collection cycles to reduce burden

To reduce the burden of SFAs selected to participate in the SFPS-IV, SFAs will be randomly assigned to provide data for only one-quarter of the calendar year. Weighting adjustments will be applied to allow quarterly data to represent the entire year.

B.3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Target response rates vary by type of data collection and respondent and are shown in Tables B1.1, B.1.2, and B.1.3. A wide range of methods will be

used to maximize participation and reduce nonresponse in all aspects of data collection. The study team will undertake several activities to lay the groundwork for our intensive recruitment campaign, including securing endorsements and training the recruitment team. A comprehensive set of recruitment materials, discussed in depth in Section A.2, describes the purpose of the study in a straightforward way that stresses the important role each participating State, SFA, school, and individual will play in the study's success. A study website to increase the legitimacy of the study will also be developed.

Gaining national, regional, and State/Territory support for the study is critical to our success in securing participation. The study team will seek an endorsement letter from a relevant professional organization (Appendix C09), and USDA will also provide a letter and email of support for recruiting FSMCs (Appendix C08) and SFAs for the study (Appendix C12). Such letters and emails will provide critical study support and recruitment leverage when reaching out to SFA directors. States, FSMCs, and SFAs will be invited to attend a webinar conducted by FNS and study leaders to learn more about the study and its importance (Appendix C11).

B.3.1. SFA recruitment (Groups 1a, 1b, 2a, 2b, 3, and the Outlying Areas)

Recruiters will take part in a training for the specific group they are assigned to recruit. Training will cover project details, anticipated challenges, and expectations. With a full understanding of the project and its goals within the current environment of school food service, recruiters will impart a

level of aptitude and professionalism in all communications with study participants. Recruiters will call SFA directors to confirm receipt of outreach materials, assess eligibility, describe study objectives, address any SFA concerns, explain the study timeline and participation requirements, and discuss incentives (Appendix C13). For the "certainty" SFAs, we will assign team members with recruitment experience and expertise in school food service to address challenges unique to recruiting these large SFAs. The study team will also locate any sample overlap with other projects and use existing relationships to help make recruiting more efficient. Because Guam and Hawaii will have one SFA each with many schools sampled, recruiters will enlist the help of the SFA directors to facilitate school recruiting.

Based on findings from the first Outlying Areas feasibility assessment approved by OMB on March 19, 2018, under *FNS Generic Clearance for Pre-Testing, Pilot, and Field Test Studies*, the study team will take further steps to promote a high response in the Outlying Areas. This includes providing ample time for SFAs and schools to complete study instruments and to complete workbooks of data to be collected ahead of the request so respondents can see specifically what information will be asked of them. In the absence of in-person visits to SFAs and schools in the Full Outlying Areas (FOA), the study team will also provide extra support through phone technical assistance. For Puerto Rico in the Limited Outlying Areas (LOA), the study team will also provide Spanish recruitment materials and will conduct recruitment calls in Spanish to accommodate SFA staff.

Following recruitment of SFAs, recruiters will leverage SFAs' agreement to participate in the study to gain the support of school-level contacts. For Groups 2a, 2b, 3, and FOA, recruiters will work with principals and SNMs to understand school-specific context and requirements for data collection.

B.3.2. Student and parent recruitment (Groups 2a and 2b)

The study team will enlist the help of school liaisons to disseminate information about the study to parents of sampled students, communicating the legitimacy and importance of the request. The study team will maximize parent consent rates by advocating for opt-out procedures wherever possible; if active consent is required, the study team will obtain verbal consent if districts allow it in addition to written consent. The study team will also enlist the help of school liaisons to maximize return rates for active consent forms by offering liaisons a larger stipend (described in Section A.9). Recruitment and consent materials will be provided in both English and Spanish. The study team will also ask school liaisons about Spanish-speaking parents or students, so bilingual interviewers can be appropriately assigned. The study team will train field interviewers to build rapport with students to maximize assent rates. Student weights will properly account for sampled students for whom parent consent is not obtained.

B.3.3. Data collection

The study team will implement several strategies to minimize nonresponse during data collection. To streamline the data collection planning process, the study team will conduct planning interviews with SFAs

to collect key data that informs subsequent activities. First, for SFAs with on-site data collection (mainland only), the study team will conduct quality assurance visits to ensure that interviewers are following study procedures and engaging effectively with district and school staff and students. The study team will use these visits to adjust any interviewer behaviors or procedures that appear to be adversely affecting response rates. Second, the study team will provide one-on-one technical assistance for complex or time-intensive data collection requests. Third, the study team will accommodate the schedules of SFAs and school staff when scheduling cost interviews, and the study team will strive to minimize disruptions to staff and students when the study team is working in schools. Fourth, the study team plans to offer incentives to respondents (described in Section A.9). Fifth, instruments will be offered in Spanish to study participants who are best able to respond in this language, including Outlying Areas respondents in Puerto Rico as well as parents and students. Finally, the study team will closely monitor response rates across instruments and activities and adapt our design to optimize response rates. The study team may use more intensive or frequent follow-up with subgroups that have lower response rates (for example, by calling selected sample members instead of sending email reminders) to avoid potential bias resulting from differential response.

B.3.4. Dealing with response rates lower than 80 percent

The study team anticipates that the overall response rate for the study will not exceed 80 percent. In addition, despite the efforts described in the preceding sections, it is possible that response rates for individual

instruments may fall below this threshold. In such cases, the study team will need to account for the potential that respondents to the various instruments may differ from nonrespondents in important ways. As described in Section B.2.2, the study team will calculate adjustments to the sampling weights to account for these differences as much as possible, using covariates available on the frame that are associated with (1) the propensity to respond and (2) the outcome variables of interest. To assess how well these nonresponse adjustments account for differences between respondents and nonrespondents, the study team will conduct nonresponse bias analyses for each set of weights that are used to meet the objectives of the study. The nonresponse bias analyses will summarize the response rates corresponding to each set of weights, assess the differences between respondents and nonrespondents overall and within subgroups of interest, and evaluate how much estimates using nonresponse-adjusted weights differ from the frame.

B.4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The SNMCS-II and SFPS-IV instruments included in this submission are based on the instruments submitted and pre-tested in the previous SNMCS-II (OMB Control Number 0584-0648, expired 9/30/2022) and SFPS-IV ICRs (OMB Control Number 0584-0471, withdrawn 6/11/2021). Therefore, there was no need to conduct a comprehensive pre-test of all the instruments. To address changes incorporated into the current study, we conducted a pre-test in

early 2024 focused on new or changed content and procedures for the SFPS-IV and FFVP study components, including:

- SFPS-IV component: Food Purchase Planning Interview (Appendix C14) and Quarterly Food Purchase and USDA Foods data collection (Appendices F01.05, F01.10, F01.01, F01.02); new content in the SFA Director Survey (Appendix F03.01)
- FFVP component: FFVP SNM Survey (Appendix F04.02), FFVP Menu Survey (Appendix F02.04), Observation Guide (Appendix F07), Student Interview (Appendix F08.01)

Based on pre-test findings, we clarified question wording and response categories, edited instructions for respondents, and revised instruments to improve the flow of interviews. Respondent burden for the pre-test is included in the burden table (Appendix H) and the pre-test memo results are included in Appendix M.

B.5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Mathematica will collect and analyze the information, in coordination with FNS. Table B.5.1 lists the individuals who consulted on statistical aspects of the design, data collection instruments, or procedures. 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.

Table B.5.1. Individuals consulted on data collection or analysis

Mathematica staff	Title	Phone	Email
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