Supporting Statement Part A for

USDA Professional Standards Trainings and Tracker Tool (PSTTT)

OMB Control Number 0584-0626

Project Officer: Brittany Gorman

U.S. Department of Agriculture

Child Nutrition Programs, FNA

5601 Sunnyside Avenue, Building 4

Beltsville, MD 20705

(703) 305-2621

Brittany.Gorman@usda.gov

Table of Contents

Supporting Statement – Part A.....4

1. Circumstances That Make The Collection Of Information Necessary. 4
2. Purpose And Use Of The Information 5
3. Use Of Information Technology And Burden Reduction.....9
4. Efforts To Identify Duplication. 10
5. Impacts On Small Businesses Or Other Small Entities 10
6. Describe the Consequences Of Collecting the Information Less Frequently……....11
7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5…….. ……..…...12
8. Comments to the Federal Register Notice And Efforts For Consultation……...…14
9. Explain Any Decision To Provide Any Payment Or Gift To Respondents……...…22
10. Assurances Of Confidentiality Provided To Respondents 22
11. Justification For Any Questions Of A Sensitive Nature.....24
12. Estimates Of The Hour Burden Of The Collection Of Information. 24
13. Estimates Of Other Total Annual Cost Burden 26
14. Provide Estimates Of Annualized Cost To The Federal Government.....27
15. Explanation of Program Changes Or Adjustments 28
16. Plans For Tabulation, And Publication And Project Time Schedule……..28
17. Displaying The OMB Approval Of Expiration Date 28
18. Exceptions To The Certification Statement Identified In Item 19 29

Appendixes

APPENDIX A—The Healthy Hunger Free Kids Act of 2010 (Section 306)
APPENDIX B— USDA Professional Standards Trainings and Tracker Tool Screenshots
APPENDIX C—Professional Standards Trainings and Tracker Tool (PSTTT) Training Video Transcripts and Screenshots
APPENDIX D—USDA Professional Standards Trainings and Tracker Tool User Guide
APPENDIX E—Comment-HISD
APPENDIX F—FNA-Response-HISD
APPENDIX G—Comment-Henderson
APPENDIX H—FNA-Response-Henderson
APPENDIX I—Comment-R-P Schools
APPENDIX J—FNA-Response-R-P Schools
APPENDIX K—Anonymous Comment
APPENDIX L—Comment-Kansas
APPENDIX M—FNA-Response-Kansas
APPENDIX N—Comment-MDOE
APPENDIX O—FNA-Response-MDOE
APPENDIX P—Comment-TUSD
APPENDIX Q—FNA-Response-TUSD
APPENDIX R—Comment-NERIC
APPENDIX S—FNA-Response-NERIC
APPENDIX T—Comment-Old Rochester
APPENDIX U—FNA-Response-Old Rochester
APPENDIX V—Feedback from Users
APPENDIX W—CY26 PHA PSTTT Privacy Threshold Analysis
APPENDIX X—Login.gov Privacy Act Statement
APPENDIX Y Burden Table

1. Explain the 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 purpose of this request is to reinstate the expired information collect request. There have been no changes in the collection requirements or the burden since the last submission. The Food and Nutrition Administration (FNA) is still legally required to collect this data and is thereby continuing to collect in violation of the Paperwork Reduction Act.

The USDA Professional Standards Trainings and Tracker Tool (PSTTT), formerly known as the Professional Standards Training Tracker Tool, was developed by Child Nutrition Programs of the Food and Nutrition Administration (FNA) for all school nutrition professionals working for the school meal programs, which includes the National School Lunch Program (NSLP), School Breakfast Program (SBP), NSLP afterschool snack service, and preschools operating under the NSLP and SBP. The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals (See APPENDIX A). To meet the training requirements and assist in locating and

keeping track of training, the USDA FNA's web-based application tool with a SQL-server database is available to local educational agencies and school food authorities (SFAs) through the FNA public website, as a guest user or with Login.gov. These resources facilitate compliance with HHFKA requirements and are provided at no cost to the state, district, or school nutrition professionals.

2. 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 Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See APPENDIX A). The rule, published March 2, 2015, requires a minimum amount of annual training hours for all State agency (SA) personnel (state directors of school nutrition programs and state director of distributing agencies) and school nutrition professionals (school nutrition program directors, managers, and staff). All school and SA nutrition professionals are responsible for meeting their own training requirements. A manager can monitor to ensure his/her employees are meeting their requirements. The rule requires each SFA to maintain records that annually document compliance with the professional standard requirements for all school nutrition program employees. Documentation must be sufficient to demonstrate that employees are meeting the minimum professional standards during Administrative Reviews (AR). The ARs, however, do not have a requirement regarding the methods used for this recordkeeping. The PSTTT is one of the methods that can be used to track the training. For their ease, SFAs and SAs have the option to use a

tracking tool (such as USDA's PSTTT) to assist in keeping track of the training activities. With a tool such as PSTTT, an SFA or SA may generate annual records for verification of training completed. Documentation such as copies of the training agenda, sign-up sheets, and other paper documents are also acceptable. Each SFA decides how to maintain the records to document training completion. The burden for State directors and SFAs to maintain records to demonstrate compliance with the professional standards is included in OMB Control Number 0584-0006 7 CFR Part 210 National School Lunch Program and Administrative Reviews in the School Nutrition Programs (expiration date October 31, 2027). The burden shown for the information collection requirements in this collection is the reporting

burden for the State agencies and the school nutrition professionals.

Information stored in the PSTTT is for the convenience of the user; additionally, USDA neither collects nor reviews any training information logged by users.

Required training topic areas will vary according to position and job requirements. In addition to hiring standards, mandatory annual training is required for all individuals involved in preparing school meals. FNA's web-based application is available to local educational agencies and school food authorities through the FNA public website. See APPENDIX B for sample screenshots of the PSTTT.

The PSTTT helps State and school nutrition professionals to keep track of their training hours. By tracking their success, employees are motivated to build their skills and

empower staff to lead and efficiently operate school nutrition programs. SFA-level compliance with the professional standards is included as part of the AR conducted by State agencies every three years. The ARs are done on the current school year but may look back on the previous year. The AR is a comprehensive off-site and on-site evaluation of all SFAs participating in the National School Lunch Program, School Breakfast Programs, and other Federal school nutrition programs. As a feature of the PSTTT, generated reports can be easily viewed during the AR by State agency personnel to verify compliance with the required annual training hours. While the requirement for the annual training hours is mandatory, using the PSTTT to track training is voluntary. Users have discretion on how frequently to record their trainings. They can enter their training on occasion, quarterly, weekly, monthly, and/or annually to log training to meet the required hours for their position. State and local school district nutrition professionals can also use other means to track their training. The PSTTT is used by an audience (school nutrition professionals and state agency personnel) that varies widely in technical ability and knowledge, and the web application is designed to be intuitive to use and accessible to all local school districts. In addition, it is imperative that there is a mobile friendly version of this PSTTT application to ensure easy usage and accessibility across mobile devices. This allows users to enter their training information at their pace either directly after a training has been completed or at a later time and date. Training videos (See APPENDIX C), along with a user guide (See APPENDIX D) on using the PSTTT is available on the PSTTT web site. The training videos and user guide are meant to equip the users with the tools and knowledge needed to assist in using the PSTTT.

Create Profile

The user can create a user profile with the following information: school district/address; school name/address; school nutrition professional – contact information/email address; title of school nutrition professional or role in school nutrition program; and hiring date. The user logs the following training information: key area; training topic; learning objective; training title; training hours/minutes; date of training; and provider or organization offering training, including state, local, or national.

The PSTTT has multiple time saving features available that are helpful for users. This tool provides a list of trainings in the database that users can select and the course information and training hours auto-populate. Users can also enter multiple learning objectives or training topics for one-single training. Managers can enter trainings for multiple employees at the same time. This tool shows managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement. The tool also provides other great features, such as: running reports, printing certificate of completion once annual training requirements are met, editing files, deactivating employee profiles of staff no longer at the organization, auto-populating school contact information (available through school database where data is imported from the National Center for Education Statistics (https://nces.ed.gov/ccd/elsi/tableGenerator.aspx)), bi-annual email reminder notification to complete remaining training hours to meet annual requirements, and ability to export and save results in multiple file formats, including PDF (.pdf), Excel and Word or higher

(.docx). It has a user-centered, simple, intuitive interface, making this tool user-friendly and easy to navigate.

Information Logged

The user logs the following training information: key area, training topic, learning objective, training titles, training hours/minutes, date of training, and training provider or organization (including state, local, or national). Additionally, users can add certificates to logged trainings or log certifications separate from trainings. Users input the certification name, completion date, and expiration date. The PSTTT will send a reminder email to the user 30 and 90 days prior to the expiration date.

Reports

Summary and detailed reports can be generated by the user and display completed hours of training to be used during the AR. The reports can be a summary of one or more employees at a time by providing quick glance of their status with the annual training requirement. Additionally, the detailed report provides information on individuals or all staff pertaining to training hours that are grouped by training topics and objectives, certificates of completion, date range, etc.

3. 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.

Data collection is 100 percent electronic. The tool is available through the FNA public website. Users create a profile using the following information: school district/address, school name/address, individual name, email address, title of their position, and hiring date. Managers are able to create user profiles for their own employees. In addition, there is a mobile friendly version of this PSTTT application to ensure easy usage and accessibility across mobile devices. The application is compatible with all mobile operating systems (iOS, Android, and Windows). FNA estimates that all 70,042 responses in this collection will be collected electronically.

Burden Reduction Efforts

This collection is an extension, without change, so FNA doesn't estimate any reduction in burden for this collection at this time.

Prior burden reduction initiatives have included implementing bulk upload templates, thereby streamlining the process and decreasing the time required for entering employee user profiles, training logs, and certifications.

4. 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.

There is no similar information collection. Every effort has been made to avoid duplication. FNA solely administers the free USDA PSTTT for the purpose of tracking professional standards training required under Administrative Reviews.

5. 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.

Information being requested or required has been held to the minimum required for the intended use. The PSTTT has multiple time-saving features that are helpful for users. This tool provides a list of trainings in the database that users can select, and the course information and training hours auto-populate. Users are also able to enter multiple learning objectives or training topics for one single training. Managers can enter trainings for multiple employees at the same time. This tool shows managers and/or staff how many training courses and hours are taken and how many hours remain to be completed to fulfill the annual training requirement. Out of the 10,006 total respondents for this collection, FNA estimates that 2,800 (28%) of them are small entities.

6. 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 is an ongoing, voluntary information collection that is needed in order to meet requirements outlined in the Healthy Hunger-Free Kids Act of 2010 regarding Professional Standards. The Healthy Hunger-Free Kids Act of 2010 (Section 306) requires Professional Standards for state and local school district nutrition professionals (See APPENDIX A). Not meeting the yearly training requirements will put the particular school or district out of compliance. The organizations are given a period of time for corrective actions. Using the PSTTT is just one of the tools available for tracking required training and is strictly voluntary. School nutrition professionals can decide which tool or method of tracking training requirements fits their needs best. They also have the option to decide how frequently they will record the trainings (on occasion, quarterly, weekly, monthly, and/or annually).

As part of the Professional Standards requirements for school nutrition professionals and State agency personnel, State reviewers have instant access to the PSTTT to obtain information for the AR. By school nutrition professionals entering their training information, State reviewers can gather information for the AR before going onsite to the SFA. This time-saving feature reduces the time the reviewer would have to spend at the facility. It also reduces the review time by having all the information in one location and not having to review multiple sheets of paper. Additionally, school foodservice directors or authorized personnel may regularly peruse their staff accounts to ensure trainings are recorded regularly. The previous version of the PSTTT was a downloadable application with limited capabilities.

7. 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;**

Users can decide when and how frequently they want to record the trainings. The Professional Standards regulations require school nutrition professionals to have a record to show the completed hours by the end of the school year. Since it is up to the users to track their completed training, they can choose to track their trainings as they are taken on a weekly reporting basis, monthly, when they gather information for performance reviews, etc. Since this is the case, FNA expects that the information will be recorded on a weekly, monthly, quarterly, or annual basis or as it occurs on occasion. ARs occur every three years and school nutrition professionals are required to have their yearly records showing completed training requirements ready to submit every three years for the AR.

- **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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publications 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.

A notice was published in the Federal Register on March 31, 2026, Volume 91, pages 15944. The comment period ended on June 1, 2026. FNA received nine comments in

response to the notice. Two comments complimented the PSTTT's functionality and ease of use (See Appendixes E–H). Two commented that there were outdated components of the tool and three mentioned that there were some challenges to use and that other methods for tracking professional standards were utilized. FNA requests additional feedback to inform future enhancements to the PSTTT and reminds the public that use of the PSTTT remains optional (See Appendixes I–Q). Lastly, two comments focused on professional standards and not on the PSTTT. FNA clarified the professional standards and solicited future engagement, if desired by the person or organization. (See Appendixes R–U).

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.

FNA sought feedback from PSTTT users, including state and local program operators:

1) Sara Bennett

Virginia Department of Education

sara.bennett@vdoe.virginia.gov

2) Diane Kohls

Wisconsin Rapid Public Schools

diane.kohls@wrps.net

3) Katrina Arrington

Baltimore City Public Schools

KCArrington@bcps.k12.md.us

FNA received suggestions from users to enhance features to include varied reporting filters and adjust filter views for ease of use. Feedback has been added to the project backlog for future enhancements for consideration when feasible due to current operations and maintenance activities (Also see Appendix V).

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

No payment or gift will be provided to respondents.

10. 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. The Privacy Impact Assessment (PIA) and the Privacy Threshold Analysis (PTA) were prepared, submitted to, and approved by FNA Privacy Officer (See Appendix W, Privacy Threshold Analysis) on March 12, 2026. The Privacy Act Notice is available on the PSTTT. Privacy safeguards

can be found in the PIA under Section 8.0. This ICR does not request any personally identifiable information for the PSTTT.

Employees can create their user profiles after receiving confirmation from Login.gov. The Login.gov service is provided by the U.S. General Services Administration to offer the public secure and private online access to participating government programs. Level 1 Login.gov access collects name, email, and authentication method such as phone number or security key. The users' first and last name and email addresses are collected through their eAuthentication/Login.gov account and are automatically populated into PSTTT. FNA does not use this personal information. The privacy act statement for Login.gov further describes privacy and security (See Appendix X).

Some school nutrition professionals may not have access to computers. Therefore, managers can create accounts for employees who are unable to create their own. Managers have access to log in training hours for their designated employees. Only managers can search and add his/her employees (who have already created a profile) to their employee roster. A school manager can only add an employee that is in the same school/district and State agency managers can only add a user that is in their state. The federal contractor employees working on the PSTTT must adhere to the contract in place for developing and ongoing maintenance and enhancements and adhere to procedures and policies in place for protecting the information that they see during these activities, including encryption of user's names and emails. The contract specifically states that the

use of any information that is subject to the Privacy Act will be utilized in full accordance with all rules of conduct as applicable to Privacy Act Information.

11. 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 involve questions of a sensitive nature.

12. 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 collection has 10,006 respondents, 70,042 responses, and 17,090 burden hours.

Estimated Number of Respondents: The total estimated number of respondents (see Appendix Y) is 10,006. This includes 6 State agency personnel and 10,000 school nutrition professionals who voluntarily choose to utilize this tracking tool.

Estimated Number of Responses per Respondent: Total estimated number of responses per respondent across the entire collection is seven. The estimated number of responses per respondent for using the tracking tool to search and log trainings is five. The tracking tool users are first required to create their user profile, which will be saved for future use. It is estimated that the user will be updating and managing their records on a quarterly basis. The estimated number of responses per respondent for the training webinar and the recording of trainings is one.

Estimated Total Annual Responses: 70,042

Estimated Time per Response: The estimated time per response across the entire collection is approximately 14 minutes (0.24 hours). For the training tracker tool, the estimated time of response varies from five to ten minutes depending on familiarity of the tool and the amount of reports created with an average estimated time of 7.5 minutes (0.125 hours) for all participants. The training refresher webinar of 60 minutes (1 hour) is available for all participants. Participants can record trainings into the tracking tool, which is estimated to take 5 minutes (0.083 hours) to complete.

Estimated Total Annual Burden on Respondents: 17,090.25 hours (rounded to 17,090 hours).

Professional Standards Trainings and Tracker Tool Burden Estimates Table

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

Respondent	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dxe)
Reporting Burden for State, Local, and Tribal Govt					
State agency Personnel sessions, searching and logging trainings	6	5	30	0.125	3.75
Training Webinar	6	1	6	1	6
Recording of Trainings on the Tool	6	1	6	0.083	0.498
School Nutrition Professionals' sessions, searching and logging trainings	10,000	5	50,000	0.125	6,250
Training Webinar	10,000	1	10,000	1	10,000
Recording of Trainings on the Tool	10,000	1	10,000	0.083	830
Total Reporting Burden	**10,006**	**7**	**70,042**	**0.24**	**17,090.25**

The estimate of respondent cost for PSTTT is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2025 National Occupational Employment and Wage Estimate (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage is $16.96 for elementary and secondary food preparation workers (Occupational Group 35-2021)

and $32.47 for State education occupations (Occupational Group 25-0000). With approximately 80% food preparation users and 20% State agency users, the combined wage for this entire group of users is approximately $20.06 per hour. The estimated annualized cost to respondents is $ 455,964.46 (including fringe benefit cost) calculated as follows:

TOTAL COST TO THE PUBLIC =

17,090.25 X $20.06 = $342,830.42

$342,830.42 X 0.33 = $ 113,134.04 (fringe benefit rate)

$ 342,830.42 (initial cost) + $ 113, 134.04 (fringe benefit rate) = **$ 455,964.46 (total cost)**

13. Provide estimates of the total annual cost burden to respondents or record keepers 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.

14. 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 estimated annualized cost to the Federal government is approximately $722, 979.20 (including fringe benefit). The cost estimate for two federal employees is based on a 20% effort (or 0.40 full-time equivalents) at the GS-13 Step 4 average salary in the Washington, DC locality per OPM's 2026 pay charts. Federal employees are the subject matter experts on Professional Standards, FNA programs, and customer expectations, whereas contract staff are responsible for managing the technical aspects of the tool, such as developing, launching, training, and maintaining it with federal employee oversight. The decrease in cost with this renewal is due to decrease in amount of hours for staff due to support focused on operations and maintenance only and no enhancements to the PSTTT.

This estimate is based on the following:

Annual server hosting and maintenance cost:

$485,000.00

Two Federal employees* ($133,964 x 0.40)	$53,585.60
Contract Staff** (Operations and maintenance of tool)	$184,393.60.00
Subtotal:	$722,979.20 (initial cost)

$53,585.6X 0.33 = $17,683.25 (fringe benefit rate calculated from federal employee costs)

$722, 979.20 (initial cost) + $17,683.25 (fringe benefit rate) = $740, 662.45 (total cost)

Total:	$740, 662, 45

* 0.40 Full-Time Equivalents of GS-13 Step 4 salary using 2026 OPM Pay Chart in Washington DC locality
** Cost of awarded contract

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

This is a reinstatement of the previously approved collection with no changes. This collection was approved with 10,006 respondents, 70,042 responses, and 17,090 burden hours.

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

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

17. 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.

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I. There are no exceptions to the certification statement being requested.