

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

Study of Nutrition and Activity in Child Care Settings

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A.1. 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.

For many American children, child care is an essential component of daily life—it is where they receive much of the nutrition, care, and attention they need for proper growth and development. In the spring of 2011, in a typical week, 12.5 million American children under age 5 were in regular child care arrangements (Laughlin, 2013). In 2012, 10 percent of children experienced food insecurity, an indication of inadequate nutrition (Olivera, 2014). In addition, recent research links diet and weight status in early childhood to later risk of overweight and obesity (Cunningham, Kramer, and Narayan, 2014). According to the U.S. Department of Health and Human Services, over one of five children under five years old are overweight or obese (National Center for Health Statistics, 2011). In recognition of the importance of nutrition and physical activity in child care, Congress directed the USDA to conduct a Study on Nutrition and Wellness Quality of Childcare Settings in Section 223 of the Healthy Hunger Free Kids Act (HHFKA) of 2010 (Appendix A). USDA awarded a contract to Abt Associates Inc. to conduct this study on September 26, 2014.

Specifically, Section 223 of HHFKA requires the Secretary, in consultation with the Secretary of Health and Human Services, to conduct a nationally representative study of child care centers and family or group day care homes (HHFKA of 2010, Pub. L. No. 111-296, Section 223). The mandate states that the USDA shall assess the nutritional quality of foods served to children, as well as the quantity and types of physical activity and sedentary activity in which children are engaged. It also requires an assessment of the barriers and facilitators to providing foods that meet the Dietary Guidelines; providing opportunities for physical activity; and participating in CACFP. The legislation identified \$5 million for the study. The study

design uses a nationally representative sample of CACFP providers that provides sufficient sample to address the legislatively-mandated policy questions within the limited budget appropriation.

In order to maximize the efficiency of such a large-scale data collection and minimize burden on the small-businesses that provide child care around the nation, FNS combined the required study from Section 223 of HHFKA with a second study, modeled on the highly-successful Study on Nutrition and Dietary Assessment (SNDA) in Schools series, now in its fifth cycle. The second study will collect additional data on key nutrition and wellness variables in CACFP child care settings.

FNS consulted with the Department of Health and Human Services (HHS) on their design of the National Survey of Early Care and Education to help develop the PWS for the current study. USDA awarded a contract to Abt Associates Inc. to conduct this study on September 26, 2014.

The Study of Nutrition and Activity in Child Care Settings (SNACS)¹ is a new collection.

A.2. 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 intent of SNACS is to document the quality of meals and snacks offered in child care facilities, relative to the current DGA and the types of activities that might promote or inhibit healthy weight and development. The study will also provide insights into how nutritional quality and physical activity in child care might be improved. Lastly, the study will collect data

¹ The title of the study was published in the 60-day notice as the “Study on Nutrition and Wellness Quality in Childcare Settings (SNAQCS)”; however, for participant recruitment materials and surveys, the study will be referred to as the Study of Nutrition and Activity in Child Care Settings (SNACS) since this title is more consumer friendly.

on the costs of child care meals and snacks in relationship to CACFP reimbursements, other funding, and meal quality. Once completed, FNS will make the study's reports available on their website. Appendix B presents the specific research questions, associated outcome measures, and the data collection instruments that will be used to answer the research objectives.

CACFP sponsors and providers are required to participate in the surveys. Participation by parents and their children is voluntary. .

SNACS will collect a broad range of data from nationally representative samples of respondents to obtain completed responses from 1,326 child care provider organizations, 3,000 children and infants in their care, and 4,175 parents during the 2015-2016 school year. Data will be collected from a variety of types of child care providers including child care centers (including Head Start centers), family day care homes (FDCHs), and afterschool programs that participate in the CACFP. The sample is designed to provide required levels of statistical precision and data quality while minimizing data collection costs and respondent burden.

On behalf of FNS, the data will be collected and analyzed by Abt Associates and its subcontractors Abt SRBI, Cincinnati Children's Hospital Medical Center, the Momentum Center (University of Michigan), The Sarah Samuels Center for Public Health Research and Evaluation, and the Early Childhood Policy Research (ECPR).

A.2.A Recruitment

Recruitment will occur at multiple levels and include outreach and recruitment to State agencies, sponsor organizations (that oversee and facilitate participation of child care providers in the CACFP), child care providers, and parents. A data management system developed and used by Abt Associates will support recruitment activities. Recruitment will involve:

- State agencies—will provide information to create the sampling frame and encourage participation of sampled child care providers. Recruiting materials

include: letters and call script (Appendix C.1); study fact sheet (Appendix C.2); and letters of endorsement for the study from the USDA and the President of the CACFP Forum (Appendices C.3 and C.4). This information will be provided via email to the State agencies.

- Sponsors of child care providers—recruitment materials include: letter and call script (Appendix C.5); a multi-color Study Brochure (Appendix C.6); and the endorsement letters and fact sheet also sent to State agencies. This information will be mailed to the sponsors.
- Child care providers—sampled for the study will receive a letter via mail and telephone call (Appendix C.7) to answer any questions they have about the study and obtain their agreement to participate in data collection activities. Providers will also receive the endorsement letters, study fact sheet, and brochure.
- Parents—will be recruited by on-site study liaisons identified by the child care providers and hired by Abt Associates for the data collection period. Recruitment materials include: talking points (Appendix C.8) to explain the study, the Study Brochure (Appendix C.6), and the Parent Consent Form (Appendix C.9). Liaisons will also be provided with a brief description of the study (Appendix C.10) to add to provider newsletters or center websites to raise awareness about the study.

A.2.B Data collection

The study's data collection activities can be grouped into three broad categories (1) nutrition and wellness policies and practices in child care settings; (2) parent and child data collection; and (3) meal costs in CACFP child care settings. The specific forms, surveys, interviews and data collection activities included in each category are described below.

Nutrition and wellness policies and practices in child care settings

Provider Web Survey

The Provider Web Survey (Appendix D.1a) will collect data to examine nutritional quality of foods served, wellness policies, menu planning, food purchasing, and additional program characteristics. The Provider Web Survey is designed to be self-administered, and email invitations (Appendix D.1b) with electronic links to the survey will be sent to the provider contact person who will be asked to forward the survey to other provider staff as needed to complete the survey.

Menu Survey

Sampled child care providers will be mailed a paper Menu Survey (Appendix D.2a) along with detailed instructions for completing the survey and a cover letter (Appendices D.2c-D.2e). Providers will be asked to complete the Menu Survey during a specified one-week period (referred to as the target week). On the Menu Survey, respondents will be asked to list all foods served to children while in child care, including foods that may not contribute to satisfying the CACFP meal pattern. They will provide detailed information needed for nutrient analysis including food name, a detailed description, brand name, preparation; and recipes (when applicable and readily available). An Infant Menu Survey (Appendix D.2b) for the target week will be included for all CACFP centers and CACFP family day care homes serving infants.

Meal Observation Booklet

The Reference Portion Measurement Form (Appendix D.3), the Meal Observation Form (Appendix D.4) and the Classroom Waste Observation Form (Appendix D.5) will be combined to make up the Meal Observation Booklet. These forms will be used together to capture the amounts of food and beverages served to sampled children, how much is consumed, and how

much is wasted in meals and snacks while in child care using a direct observation approach. Each form is described below.

The field interviewers will use the Reference Portion Measurement Form to determine the average gram weight or fluid ounces (fl oz) of a reference serving or one “serving unit.” The reference serving is defined by the utensil that is used to serve the food (e.g., one spoon of peas, a scoop of mashed potatoes) or a single serving unit (e.g., one cracker, one chicken nugget). To determine the average gram weight or fluid ounces contained in a “reference portion,” the form will be used to record the weights (or fl oz) of five reference portions of each item to be served. The average weight or fluid ounce (total weight/volume divided by five) is then calculated. Food preparers will assist in the calculation of the reference portion.

The Meal Observation Form is a paper-and-pencil form that field interviewers will use to record amounts of each food served (including initial servings and additions), and amounts not consumed (spilled, dropped, and left) for up to three children per observer using a visual estimation method based on reference portions in order to calculate amounts consumed for each food and beverage. There are two different forms: one will be used in centers that provide food for children and the second will be used in centers that require children to bring food from home. The form also collects information on meal start and end time and the start and end times for each of the three observed children. This form will be completed by field interviewers and will place no burden on child care providers.

The Classroom Waste Observation Form will be used to collect the amount of foods left in serving dishes (in terms of reference portions) after service, and record what is done with the food (thrown away or saved as leftovers). The instrument also will be used to record the total

number of children served at a table. Food preparers will assist in measuring the food remaining after the meal.

Environmental Observation Form

As part of the on-site data collection, field interviewers will use the Environmental Observation Form (Appendix D.6) to conduct observations of physical activity opportunities and actual activities, and practices related to serving meals and snacks in a sample of Head Start and CACFP child care centers. The physical activity observations will include an assessment of minutes spent in physical activity, sedentary activity, and screen time as well as an assessment of the physical environment including play equipment available, quality of physical activity space, and observations about child care staff-child interaction during and related to physical activity. These observations will be collected by field interviewers and will place no burden on child care providers.

Parent and child data collection

Child Food Diary

The Child Food Diary (Appendix E.1a) will be completed by parents and used to collect details about all foods and beverages consumed by a child for a full day on a non-child care day and all the food and beverages consumed for the remainder of the day (outside the child care setting) on a child care day (Appendix E.1b). The Child Food Diary includes simple, yet detailed instructions for recording details about foods the child consumes, examples of the right way to record the foods consumed (to illustrate desired level of detail), and two-dimensional, graphic measurement guides to help parents estimate portion sizes. On-site field interviewers will distribute the diary to the parents of sampled children and explain to them how to record the data. When parents return the diary, the field data collector will meet with or call them to review the

forms for completeness, probe for possible missing meals or beverages, and obtain necessary details about the foods and amounts consumed (Appendix E.1c).

Standing Height and Weight Form

The Standing Height and Weight Form (Appendix E.2a) will be used by field interviewers to record the standing height in centimeters and weight in kilograms of all sampled children ages two and over to determine their body mass index (BMI); the Standing and Holding Weight Form (Appendix E.2b) will be used to weigh one-year-old children and children who cannot stand on their own.

Infant Food Intake Form

The Infant Food Intake Form (Appendix E.3) will be used by provider staff to record the amount and types of food consumed by up to five infants (under the age of one year) per center at each feeding while in child care on a single target day. (Intake of each selected infant recorded on a separate form; 3 forms are provided per booklet since it is assumed that one caregiver will care for 3 infants; most centers will need to complete more than one booklet). For this age group, the Infant Food Intake Form will replace the meal observation protocol and diary. The Infant Food Intake Form builds on the records already required by licensure in many States to be kept by child care centers on intakes for individual infants in their care. For each food served, the respondent is asked to record: a detailed description of the food served (including brand names) and if formula, the amount prepared for the infant (e.g., the volume of formula in the bottle at the start of feeding.) The paper infant food intake form will be mailed to the provider staff.

Parent Interview

A Parent Interview (Appendix E.4) will be administered by field interviewers using computer-assisted-telephone interviewing (CATI) to all parents who gave consent for their child to participate in the on-site data collection. Questions asked of parents will include demographic

characteristics including child's date of birth, gender, and race/ethnicity. Information concerning the child care schedule, and whether the child brings meals and snacks from home and reasons why will also be collected. Finally, family participation in other Federal assistance programs, household size, income, and (with the exception of parents of infants) parent report on their child's activity levels.

Meal costs in CACFP child care settings

The study team will use five cost and revenue instruments to collect data to estimate the costs to produce a CACFP breakfast, lunch, supper, and snack. The cost data collection component focuses on child care centers participating in the CACFP and does not include FDCHs. Instruments include:

- Pre-visit Cost Telephone Interview (Appendix F.1) —the pre-visit telephone interview gathers information on each sampled center's structure, records availability, key personnel, use of contractors, classroom schedules and sites served by central/production kitchens.
- Pre-visit Cost Form (Appendix F.2)— a paper version will be mailed after the telephone interview and in advance of the in-person interviews. This form consists of a set of self-administered questions to gather reported annual CACFP costs and revenues, enrollment and meal counts, and data on overhead and equipment costs. This form will be used to inform the in-person interviews.
- Sponsor Cost Interview (Appendix F.3) —will obtain data on (1) sponsor staffing and time allocation for the CACFP; (2) pay and benefit information for sponsor and center staff; (3) reported CACFP costs at the sponsor and center levels; (4) estimates of unreported costs; and (5) food prices. To protect the privacy of pay information, completed interview forms will list only job titles; respondents will

have the option of providing a salary range instead of an exact dollar amount. The interview will be conducted in person.

- Center Director Cost Interview (Appendix F.4) —field interviewers will conduct the interview while on-site, to collect data on (1) staff time for the preparation, service, and clean-up of meals other than that of food preparation staff, and (2) for CACFP administrative tasks done at the center level. The data collector will also obtain a completed staff roster for the center, including titles of staff who perform CACFP tasks and any pay data not available from the sponsor.
- Center Foodservice Cost Interview (Appendix F.5) —field interviewers also will conduct in-person interviews with the lead food preparer for each sampled center to collect information on the time spent during the week prior to the interview on tasks for each type of meal (breakfast, lunch, supper, and snacks), including setup, food preparation, serving meals, and also time not related to specific meals, including meal service administration, other activities, and breaks.

A.3. 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.

In compliance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce respondent burden. Surveys of providers will be web-based, with an option for telephone completion (if requested). We expect that an overwhelming majority of respondents will complete these surveys on the web. The Parent Interview will be administered using computer-assisted interviewing (CATI) to efficiently collect

complete and accurate data while minimizing respondent burden. The branching and skip patterns applied by the system will prevent staff from mistakenly skipping sections, omitting questions, or asking the wrong questions during the interview. The Pre-Visit Cost Telephone Interview will also be administered using CATI. Based on this information, 21% percent of the responses will be collected electronically (6,034 responses).

In addition, electronic mail will be used, whenever possible, to communicate with respondents (see, for example, Appendix C.1). Information about providers needed to create the sampling frame will be requested electronically from States.

Respondents will be offered in-depth training to complete the Menu Survey via a training video (15 minutes). The video will be available both on-line and delivered as a CD before the start of the Menu Survey data collection (Appendix D.2e).

A.4. Efforts to identify duplication

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

Every effort has been made to avoid duplication. The data requirements for the study have been carefully reviewed and it was determined that there is no similar data collection available. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies and none of these sources provide the necessary data. FNS solely administers the Child and Adult Care Food Program.

A.5. 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 information being requested for this study has been held to the minimum required for the intended use. Although smaller child care centers and family day care homes are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other child care center. Thus, they maintain the same kinds of information on file. The information requested will not have a significant economic impact on the small businesses.

According to Census data, 98 percent² of child care centers and family day care homes are small businesses; however, their participation is necessary to meet the study objectives and answer the research questions.

A.6. 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 data collection for the proposed study will be conducted one time only. Without this information, FNS will not be able to assess progress toward key strategic goals for the CACFP as directed by Congress in Section 223 of the Healthy Hunger Free Kids Act of 2010.

A.7. 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;**

² http://www2.census.gov/econ/susb/data/2012/us_6digitnaics_r_2012.xlsx

- 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.

A.8. 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.

A.8.A Federal Register notice and comments

An announcement was published in the Federal Register (Volume 80, No. 55, Page 15186) on March 23, 2015, and specified a 60-day period for comment ending on May 22, 2015 (Appendix G).

Public comments are presented in Appendix H. Twenty-two comments were received. Ten were identified as “comments on Federal Register Number 0584-AE18 Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act” or otherwise not pertaining to this information collection. Most of the remaining comments expressed concerns about the height and weight measurement data that will be collected on children in child care. As discussed in Section A.2, written parental consent will be required for all children participating in the study; parents can choose not to participate in the study. Several commenters were concerned about the study burden placed on day care providers. As described in Section A.2, trained field interviewers will collect most of the data, minimizing the burden on child care staff. One commenter asked whether CACFP menus could provide some of the needed data. While we will collect menus, we have found in reviewing multiple samples of menus submitted for CACFP reporting purposes that they often do not include the details necessary to conduct a comprehensive nutrition analysis and assessment of children’s intakes. For the comments that included contact information, FNS sent responses to those comments (Appendix I).

A.8.B Consultation outside of the agency

Consultations about the research design, sample design, data sources, and study reports occurred during the study’s design phase and will continue to take place throughout the study. The purpose of these consultations is to ensure the technical soundness of the study and the relevance of its findings. Table A.1 contains the individuals outside the agency who have reviewed and commented upon key documents produced by the study. Appendix J presents the comments provided by the National Agricultural Statistics Service (NASS).

Table A.1: Individuals Outside the Agency who Consulted on the Study

Name	Degree	Title	Organization	Phone Number
Doris Fredericks	M.Ed.,	Executive Director	CDI/CDC/Choices For	408-966-6111

Name	Degree	Title	Organization	Phone Number
	R.D.		Children	
Yvette Sanchez-Fuentes	C.A.	Education Consultant	The National Alliance for Hispanic Families	202-957-0464
Anne Mitchell	M.S.	President	Early Childhood Policy Research	518-966-4585
Evan Schulz	B.S.	Mathematical Statistician	National Agricultural Statistics Service (NASS)	202-690-8640

A.9. 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.

Congress has required a national study of child care centers and family daycare homes. The data quality for this study depends upon a valid and reliable sample of all child care providers who will be exerting large efforts to participate in the study. The recent CACFP Sponsor and Provider Characteristics Study (OMB Control number 0584-0601) provides strong support for concerns about a low response rate from CACFP providers. Overall provider response rate was only 58 percent (response rate for the subgroup of FDCH providers was 50 percent). The instruments for the current study are more time-intensive than the one-time data collection of the CACFP Sponsor and Provider Characteristic Study, suggesting that the response rate among CACFP providers may be even lower in the current study. We are particularly concerned about non-response among FDCH providers. These providers tend to work long hours (53.7 hours/week)³, so preventing non-response among this group of participants can be challenging.

Data collection activities for this study will require extra, over-time work on the part of child care providers and their staff. In addition, the complex study design requires data collection activities to be coordinated within one pre-assigned Target Week for each sampled provider. It is

³http://www.acf.hhs.gov/sites/default/files/opre/characteristics_of_home_based_early_care_and_education_toopre_032416.pdf

necessary that child care providers and parents provide data for the same week in order to appropriately synchronize the data (e.g. providers need to complete the Menu Survey for foods consumed during the child care day and parents need to complete the Food Diaries for foods consumed outside the child care day). This complexity requires special efforts to ensure timely and successful data collection.

Food preparer staff of CACFP child care settings will complete a **menu survey** for a child care week (the “target week”), which is estimated to take almost 4 hours to complete and will require the provision of detailed menu and recipe information of the food and beverage served.⁴ The efforts of these respondents will require significant time outside of working hours and flexibility beyond their normal job responsibilities. For example, participants may need to travel to copy centers to make copies of the menu and recipe information. Food preparer staffs’ responses and assistance are critical to the quality of the data collected for SNACS. Providing incentives to food preparer staff to complete the menu survey is consistent with procedures for other FNS studies containing menu surveys that were approved by OMB. This approach has yielded high response rates and high quality data on those studies, including the School Nutrition and Meal Cost Study (OMB control number 0584-0596, expiration date 8/31/2017) and the School Nutrition Dietary Assessment IV (OMB control number 0584-0527, expiration date 9/30/2012). The food preparer staff will receive a \$50 incentive provided as prepaid Visa cards.

Center infant caregivers in CACFP settings will complete an **infant intake form** recording all nutrient intake over the course of the child care day. This instrument is estimated to take 10 minutes to complete and will be completed outside of working hours. Therefore, respondents will be given an incentive valued at \$5 per infant in the form of a prepaid Visa card.

⁴ The new CACFP nutrition standards have several weekly best practices. Thus, this menu survey will collect data for five days to establish a comparable baseline.

Parents of sampled children in CACFP child care settings will be required to provide written consent for their child to participate in the study. As noted in section A.2, parent participation will involve permitting height and weight measurements to be recorded by field researchers for their children, responding to a brief interview, and completing food diaries of all foods and beverages consumed outside of the child care day for two or three days. Parents will complete food diaries for one child care day and one non-child care day. In addition, a subsample will complete diaries for a third day to establish usual intake. The food diary approach has been reported as providing the best estimates of energy intakes for younger children aged 0.5 to 4 years⁵ and was used successfully by the Principal Investigator for the Preschool Eating and Activity Study (PEAS).⁶ Several aspects of this data collection suggest that incentives will be important to gain cooperation. First, these parents will be predominately low-income, a group that is often hard to reach and hard to convince to participate in studies. Second, some of the data, notably height and weight, may be considered sensitive (some of the public comments presented in Appendix H support this notion). Third, parents will be required to participate in a telephone interview and maintain a detailed diary of what their child eats for two or three days which will require 30-40 minutes per day, a significant effort for parents of young children.⁷

The incentives for participation in study data collection activities are listed in Table A.2 and include \$20 for completing each child food diary on a child care day, and \$30 for completing each child food diary on a day their child does not attend child care. Incentive amounts reflect the amount that is appropriate to motivate participation and demonstrate appreciation for the time

⁵ Burrows, T.L., Martin, R., & Collins, C. (2010). A systematic review of the validity of dietary assessment methods in children when compared with the method of doubly labeled water. *Journal of the American Dietetic Association* 110: 1501-1510.

⁶ Robson, S.M., Khoury, J.C., Kalkwarf, H.J, Copeland, K. (2015). Dietary intake of children attending child care: what are they eating away from the child care center? *Journal of the Academy of Nutrition and Dietetics* 115. 1472-1478.

⁷

and effort involved in participating in the study. Incentives will be in the form of prepaid Visa cards and incentives will be given upon completion of the task.

Table A.2: Total Incentive Payments by Respondent Type and Data Collection Task

Respondent	Form/Task	Incentive Amount
CACFP Food Preparers	Menu Survey Booklet	\$50
Center Infant Caregiver	Infant Intake Form (per infant)	\$5
Parents	Child Food Diary, child care day	\$20
	Child Food Diary, non-child care day	\$30
	Child Food Diary, child care day, subsample	\$20
	Child Food Diary, non-child care day, subsample	\$30

In summary, the planned incentives for the study instruments are designed to promote cooperation and high data quality and to reduce participant burden and participant costs associated with the instruments.

In addition to the monetary incentives discussed above, other techniques will be used to achieve high response rates and reduce non-response. These methods are described in detail in section B.3 and include intensive recruitment efforts, using informative and friendly study materials, using highly trained recruiters and data collectors, and adapting procedures to site-specific conditions as needed. In addition, our sampling design involves oversampling at both recruitment and data collection stages to take into account provider ineligibility and respondent refusals.

As noted in Section A.2, Abt Associates will be hiring study liaisons in each child care provider to recruit parents to participate in the study and to assist with data collection activities. The liaison will be responsible for distributing and collecting consent forms and answering parents' questions about the study. During on-site data collection activities, the liaison will assist with arranging meal observations and interviews and assist with the collection of height and weight data. It is anticipated that in child care centers liaisons will spend 35-40 hours in these

activities; they will receive \$400 in compensation. Liaisons in FDCHs will only be involved in recruiting parents; they will receive \$150 in compensation.

A.10. 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.

All information gathered from child care sponsors, child care centers, family day care homes, child care administrators and staff, and families participating in this study is for research purposes only and will be kept private to the full extent allowed by law (i.e., the information will be disclosed only with a proper subpoena). Responses will be grouped with those of other study participants, and no individual respondents, program administrators, program staff, parents, or children will be identified in any study report. Being part of the study will not affect any USDA benefits received by programs or families participating in this data collection.

FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19078-19080, that discusses the terms of protections that will be provided to respondents.

The individuals at the child care settings participating in this study will be assured that the information they provide will not be released in a form that identifies them. No identifying information will be attached to any reports or data supplied to USDA or any other researchers.

During the life of the project, hard-copy documents will be stored in secured file cabinets and rooms, and electronic data will be maintained on secured, password-protected computer servers. Both sources of data will be accessible only by approved contractor staff. At the close of the study, all hard-copy documents will be shredded.

In reviewing and approving this study, the Abt Associates IRB verified that procedures were in place to effectively protect respondent privacy. (A copy of the IRB approval is included

in Appendix K.1.) As part of the application for study approval, the Abt Associates IRB requires a standalone data security plan that includes proper protocols to ensure privacy in data collection, transmittal, storage and deliverables such as data files and reports.

All contractor staff, including study liaisons, are required to sign a confidentiality agreement (Appendix K.2). In this agreement, staff pledge to maintain the privacy of all information collected from the respondents and not to disclose it to anyone other than authorized representatives of the study. Issues of privacy will be discussed during training sessions with all staff working on the project.

To enable other researchers to replicate SNACS analyses or to address other research questions, a public-use database will be created. The database will include all of the variables that were collected during the study. To maintain privacy, Abt Associates will remove identifying information from the file using procedures consistent with recommendations published in *Statistical Policy Working Paper 22 (Second version, 2005): Report on Statistical Disclosure Limitation Methodology* (Office of Management and Budget, 2005).

FNS and the contractor will comply with the requirements of the Privacy Act.

A.11. 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.

With the exception of the data collected on the Height and Weight Measurement Form and several questions in the Parent Interview, the surveys, interviews, and other data collection instruments do not involve questions of a sensitive nature.

Survey questions in the Parent Interview on the following topics may be considered sensitive items: race and cultural origin; household composition; total household income; and receipt of public assistance (including FNS nutrition programs). Similar questions have been used successfully with no evidence of harm in other studies such as the SNDA studies, the Access, Participation, Eligibility, and Certification (APEC) studies, and the Evaluation of the School Breakfast Pilot Program. The questions about race and cultural origin, income, and household composition are needed for the subgroup analysis. The remaining questions about participation in public assistance programs are needed to address the following Research Question: What is the weight status of CACFP participants and activity level and participation in assistance programs as reported by parents?

The Standing Height and Weight Measurement Form provides measurements on individual children. Unique identifiers are attached to each form; the child's name is not included on it. This instrument was used successfully in the Evaluation of the School Breakfast Pilot Program. The child's height and weight are needed to address the following Research Question: What is the weight status of CACFP participants and activity level and participation in assistance programs as reported by parents?

All respondents will be informed that they can decline to answer any question they do not wish to answer and that there are no negative consequences for not participating in the data collection activity. Respondents will also be assured of privacy at the outset of the interview. All survey responses will be held in secured manner; respondents' answers will not be reported to sponsor or center officials or any other program or agency, but will be combined with the responses of others so that individuals cannot be identified. FNS and the contractor will comply with the requirements of the Privacy Act.

A.12. Estimates of the hour burden of the collection of information

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

A.12.A. The public affected by this study are State agencies, private sector for-profit and not-for-profit businesses, including child care providers (e.g., centers, FDCHs, afterschool programs) and individuals, including infants and children up to age 12 in child care and parents. Appendix L shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection (including pre-notification and follow-up activities for: State, sponsor/provider, and parent recruitment; provider web survey; menu survey; and child food diaries) and for all data collection. Estimated response times are based on response times for similar instruments completed by similar types of respondents and informed by pretesting of instruments and protocols. Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate.

The total sample of respondents is the sum of the unique respondents and non-respondents for this study. The total proposed final number of unique respondents for the actual data collection will include: (a) managers from 40 State agencies⁸; (b) 603 sponsors (600 + 3 pre-test), 1,339 (1,326 + 13 pre-test) directors and food preparers, and 76 (75 + 1 pre-test) provider staff of child care centers, family day care homes, and afterschool child care providers

⁸ 20 States will be sampled for the study. The 20 managers of the State agencies administering the CACFP program will provide lists of all CACFP providers in their States. This list will be used for sampling.

that participate in the USDA Child and Adult Care Food Program (CACFP; (c) 3,006 (3,000 + 6 pre-test) children receiving care from CACFP child care centers, family day care homes, and afterschool programs; and (d) 4,184 (4,175 + 9) parents of children receiving care from CACFP child care centers, family day care homes, and afterschool child care programs; and (e) 1,953 non-respondents. As shown in the table, the total estimated burden across all data collection components (including the pre-test) is 16,237 hours.

A.12.B. The total cost of respondent burden is \$304,308. This is calculated using total burden hours and appropriate wage rates for respondent categories. Average hourly wage rates are taken from the Bureau of Labor Statistics, Wages by Occupation, May 2014. Average hourly wage rates used included Directors - (Directors, Religious Activities and Education - Elementary and Secondary Schools) - \$21.67, Food Preparers (Food Preparation and Serving Related Occupations - Elementary and Secondary Schools) - \$11.46, Provider Staff (Childcare Workers) - \$10.44, Sponsors (Education Administrators, Preschool and Childcare Center/Program) - \$25.09, Parent (All Occupations) - \$22.71, Children were assumed to not have an hourly wage rate, State Agency Managers - (Administrative Services Managers - Local Government) - \$40.11, See Appendix L: Respondent Burden for calculations.

A.13. 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 or maintenance costs associated with this information collection.

A.14. 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 annualized government costs include the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The total cost to the Federal government for all tasks is \$10,893,930 or \$2,178,786 on annualized basis for 5 years. This information collection assumes a total of 2,080 hours of Federal employee time for a GS-13, step 1 social science research analyst serving as the FNS project officer at \$43.52 per hour, for a total of \$90,522. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2015 for the Washington D.C. locality.

A.15. Explanation of program changes or adjustments

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

This is a new collection of information. This program change will add 16,237 burden hours and 28,735 responses to OMB's information collection inventory.

A.16. 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.

SNACS will collect a rich array of data to address the study's overall goals of describing the quality of nutrition and wellness policies and practices in child care settings, the intakes and food waste of children in these settings, and the costs of CACFP meals and local administration. Appendix M summarizes the key outcomes, sample, subgroups, and analysis methods for each of the research objectives.

We will prepare and submit four interim reports and one final report reflecting the study findings. The Final Report will undergo peer review. Once finalized, FNS will make the reports

and executive summaries available on its website. In addition, as discussed in A.10, Abt Associates will prepare a public-use database that will be available to other researchers at the end of the study.

The SNACS project schedule is presented in Table A.3.

Table A.3: SNACS Project Timeline

Task	Activities	Time Frame
Sampling	Develop frame and select sample	June 2016–November 2016
	Recruit sponsors and providers	September 2016–December 2017
	Recruit parents	October 2016–January 2017
Train field interviewers	Train telephone data collectors	January 2017
	Train field interviewers	January 2017
Collect data	Telephone and on-site	January 2017–June 2017
	Code & process data	March 2017–October 2017
Prepare interim reports	Prepare four interim reports and briefings	September 2017–August 2018
Prepare final report	Draft report and briefing	July 2018–January 2019
	Revised report	April 2019–November 2019

A.17. 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 data collection instruments.

A.18. 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."

There are no exceptions to the certification statement.

References

- Bartlett, S., Olsho, L., Patlan, K., Bocklin, M., Klerman, J., Connor, P. ... Crawford, P. (2013). *Evaluation of the Fresh Fruit and Vegetable Program: Final evaluation report*. Report prepared for the Food and Nutrition Service, U.S. Department of Agriculture. Cambridge, MA: Abt Associates.
- Berlin, M., Mohadjer, L., Waksberg, J., Kolstad, A., Kirsch, D., Rock, D., & Yamamoto, K. (1993). An experiment in monetary incentives. *Proceedings of Survey Research Methods Section, American Statistical Association*, 393-398.
- Bernstein L. S., McLaughlin, J. E., Crepinsek, M. K., Daft, L. M., & Murphy, J. M. (2002). *Evaluation of the School Breakfast Program Pilot Project: Summary of findings from the first year of implementation*. Report prepared for the U.S. Department of Agriculture, Food and Nutrition Service, Office of Analysis, Nutrition, and Evaluation. Cambridge, MA: Abt Associates.
- Burrows, T.L., Martin, R., & Collins, C. (2010). A systematic review of the validity of dietary assessment methods in children when compared with the method of doubly labeled water. *Journal of the American Dietetic Association* 110: 1501-1510.
- Copeland, K., Khoury, J. C., & Kalkwarf, H. (2012). *Wide variability of children's dietary intake in child-care centers*. Presented at the Annual Meeting of the American Public Health Association, San Francisco, CA.
- Cunningham, S. A., Kramer, M. R., & Narayan, K. M. (2014). Incidence of childhood obesity in the United States. *New England Journal of Medicine* 370(17), 1660–1661. doi: 10.1056/NEJMc1402397.
- Groves, R., Fowler, F., Couper, M., Lepkowski, J., & Singer, E. (2009). *Survey methodology*. New York: Wiley, pp 205-206.
- Groves, R., Singer, E., & Corning, A. (2000). Leverage-saliency theory of survey participation: description and an illustration. *Public Opinion Quarterly* 64(3), 299-308.
- Institute of Medicine. (2010). *Child and adult care food program: Aligning dietary guidance for all*. Washington, DC: National Academies Press.
- James T. (1996). Results of wave 1 incentive experiment in the 1996 survey of income and program participation. *Proceedings of the Survey Research Section, American Statistical Association*, 834–839.
- Robson, S.M., Khoury, J.C., Kalkwarf, H.J, Copeland, K. (2015). Dietary intake of children attending child care: what are they eating away from the child care center? *Journal of the Academy of Nutrition and Dietetics* 115. 1472-1478
- Laughlin, L. (2013). *Who's minding the kids? Childcare arrangements, Spring 2011*. Washington, DC: US Department of Commerce, Bureau of the Census.

Looney, S. K., & Copeland, K. A. (2014). *Dietary intake in the home environment of children who attend full-time childcare*. Presented at the Annual meeting of the International Society of Behavioral Nutrition and Physical Activity, San Diego, CA.

National Center for Health Statistics (2012). *Health, United States, 2011: With Special Feature on Socioeconomic Status and Health*. Hyattsville, MD.

Office of Management and Budget, Office of Information and Regulatory Affairs, Statistical and Science Policy (2005). *Statistical Policy Working Paper 22 (Second version, 2005): Report on Statistical Disclosure Limitation Methodology*. Washington, DC.

Oliveira, V. (2014). *Food assistance landscape: FY 2013 annual report (EIB-120)*. Washington, DC: U.S. Department of Agriculture, Economic Research Service.

Schochet, P. Z. (2008). *Technical methods report: Guidelines for multiple testing in impact evaluations (NCEE 2008-4018)*. Washington, DC: National Center for Education Evaluation and Regional Assistance, Institute of Education Sciences, U.S. Department of Education.

Singer, E. (2002). The use of incentives to reduce non response in households surveys. In Groves R, Dillman D, Eltinge J, Little R (eds.), *Survey non response*. New York: Wiley, pp 163-177.

Singer, E and Kulka, R (2002). Paying respondents for survey participation. In Ver Ploeg M, Moffitt R.A., Citro C.F. (eds.), *Studies of Welfare Populations: Data Collection and Research Issues*. Washington, D.C.: National Academy Press, pp. 105-127.

Singer E. & Ye, C. (2013). The use and effects of incentives in surveys. *ANNALS of the American Academy of Political and Social Science* vol. 645 no. 1, 112-141.