

**Supporting Justification for OMB Clearance for the Child
Nutrition Program Operations Study II (CN-OPS II)**

Part A

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Table of Contents

Part A: Justification.....A-3

A.1 Circumstances That Make the Collection of Information Necessary.A-3

A.2 Purpose and Use of the Information.....A-6

A.3 Use of Information Technology and Burden Reduction.....A-10

A.4 Efforts to Identify Duplication and Use of Similar Information...A-10

A.5 Impact on Small Businesses or Other Small Entities.....A-11

A.6 Consequence of Collecting the Information Less Frequently.....A-11

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....A-11

A.8 Comments in Response to Federal Register Notice and Efforts to Consult Outside Agency.....A-12

A.9 Explanation of Any Payment or Gift to Respondents.....A-14

A.10 Assurance of Confidentiality Provided to Respondents.....A-14

A.11 Justification for Sensitive Questions.....A-15

A.12 Estimates of Annualized Burden Hours and Costs.....A-16

A.13 Estimates of Other Total Annual Cost Burden to Respondents and Record KeepersA-19

A.14 Annualized Cost to the Federal Government.....A-19

A.15 Explanation for Program Changes or Adjustments.....A-19

A.16 Plans for Tabulation and Publication and Project Time Schedule.....A-20

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate.....A-23

A.18 Exceptions to Certification for Paperwork Reduction Act Submission.....A-23

Tables

Table A1. Estimates of respondent burden.....A-17

Table A2. Annualized cost to respondents.....A-18

Table A3. Data collection schedule.....A-21

Appendices

A. Research Issues and Research Questions

B.1 Email Notification to Regional Offices

B2. Invitation Letter to State Agency Child Nutrition Directors/Frequently Asked Questions (FAQs)/Web Survey Information Sheet

B3. Follow-Up E-Mail to State CN Directors

B4.1. CN Director Telephone Interviewer Script

B4.2. SFA Director Telephone Interviewer Script

- B5 Thank You Letter to State CN Director for Completing the CN-OPS II Survey
- B6 Email Notification to State Child Nutrition Directors List of Participating SFAs and Frequently Asked Questions (FAQs)
- B7. Invitation Letter to SFA Directors, Frequently Asked Questions (FAQs) and Web Survey Information Sheet
- B8. Follow-Up E-Mail to SFA Directors
- B9. Thank You Letter to SFA Director for Completing the CN-OPS II Survey
- C. State Child Nutrition Director Survey 2015-2016
- D. School Food Authority (SFA) Director Survey 2015-2016
- E.1 Comments from SNA
- E.2 FNS Response to Comments
- F.1. Section 28 of the Richard B. Russell National School Lunch Act Amended Through February 2014
- F.2 Healthy Hunger-Free Kids Act of 2010
- G Table of Estimated Burdens

PART A: JUSTIFICATION

A.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.

Introduction. The objective of the Child Nutrition Program Operations Study II (CN-OPS II) is to collect timely data on policy, administrative, and operational issues on the Child Nutrition Programs (CNP). The ultimate goal of the study is to analyze these data and provide input for new legislation on Child Nutrition Programs as well as to provide pertinent technical assistance and training to program implementation staff. CN-OPS II will help the Food and Nutrition Service (FNS) at the United States Department of Agriculture (USDA) better understand and address current policy issues related to CNP operations. The policy and operational issues include, but are not limited to, the preparation of the program budget, development and implementation of program policy and regulations, and identification of areas for technical assistance and training. Specifically, this study will help FNS obtain:

- General descriptive data on the CNP characteristics to help FNS respond to questions about the CNP in schools;
- Data related to program administration for designing and revising program regulations, managing resources, and reporting requirements; and
- Data related to program operations to help FNS develop and provide training and technical assistance for School Food Authorities (SFAs) and State Agencies responsible for administering the CNP.

Legal or Administrative Requirements. This study is necessary to implement Sec. 28(a)(1) of the Richard B. Russell National School Lunch Act (Appendix F.1). This legislation directs the U.S. Department of Agriculture (USDA) to carry out annual national performance assessments of the School Breakfast Program (SBP) and the National School Lunch Programs (NSLP).

SEC. 28. (42 U.S.C. 1769i) PROGRAM EVALUATION.

“(a) PERFORMANCE ASSESSMENTS.—

(1) IN GENERAL.—Subject to the availability of funds made available under paragraph (3), the Secretary, acting through the Administrator of the Food and Nutrition Service, may conduct annual national performance assessments of the meal programs under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.).”

Furthermore, the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296, Sec. 305) amended Section 28 of the Richard B. Russell National School Lunch Act by adding the following (Appendix F.2):

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

The Study. This study employs an on-going modular system for collection of data on policy and operational issues related to the CNP operations. Such a data collection system enables FNS to collect cross-sectional and longitudinal data (using selected modules or varying modules at different time points) and to, therefore, respond more quickly and effectively to requests for policy-relevant analyses. In addition, the grouping of related topics and recurring nature of the survey will reduce FNS’s information collection costs, lessen respondent burden, and reduce the data collection period. Specifically, this study will provide up-to-date information about the

nature of current CNP operations for a base period of two school years: SY 2015-16 and SY 2016-17, and for two optional one-year periods: SY 2017-18 and SY 2018-19. This is a new information collection request. This OMB Package is for planned data collection activities in Year 1 which cover SY 2015-16; separate OMB packages will be submitted as revisions of the currently approved collection for data collections proposed in school years 2016-17, 2017-18, and 2018-19. Future data collection activities will use survey instruments composed of different modules. The development of the new modules may be informed by the findings during Year 1.

Program background. The USDA-FNS administers Federal child nutrition food programs that provide nutritionally balanced meals and snacks to eligible children through 18 years of age.¹ Five major food assistance programs serve the nutritional needs of school children: the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Fresh Fruit and Vegetable Program (FFVP), the Food Distribution Program (FDP), and the Special Milk Program (SMP). These programs are designed to improve the nutritional quality of participating children's diets. Eligibility to participate in child nutrition food programs for free or at reduced-price is based on family income. Children living in families earning at or below 130 percent of poverty qualify for free meals (\$31,525 for a family of four during the period July 1, 2015 through June 30, 2016); those living in families with incomes between 130 percent and 185 percent of poverty pay a reduced-price for meals (185% of poverty is \$44,863 for a family of four during the period July 1, 2015 through June 30, 2016). The CNP have provided a safety net for school-age children with increasing emphasis on improving their nutritional status. During the 2012 school year, NSLP provided lunch and after-school snacks to more than 31 million

¹ Adults enrolled in school up to age 21 may participate in the school meals programs and persons under the age of 21 currently admitted to Residential Child Care Institutions (RCCI) as residents are also eligible to participate in the Federal child nutrition programs.

students each day in over 100,000 public and nonprofit private schools and in residential child care institutions nationwide. SBP provided breakfast to nearly 13 million students each day in over 89,000 schools.

In 2010, President Barack Obama signed the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 into law. This law made numerous changes in the USDA's child nutrition programs with the overarching goal of reducing childhood obesity and improving the diets of children. As a result of the HHFKA, FNS revised the Nutrition Standards. The final rules for the new Nutrition Standards were published in the *Federal Register* on January 26, 2012. These new Nutrition Standards are a significant departure from previous standards in that compliance is based on the specific food offered to students over a one-week period. The changes will result in the addition of more fruits, vegetables, and whole grains to school meals, while reducing calories, saturated fat, and sodium. SFAs that meet these standards receive an additional 6 cents in reimbursement per meal. The new standards for school lunches were implemented during SY 2012–13, with additional changes over a ten-year period. Standards for school breakfasts were phased in beginning in SY 2013-14. When fully implemented, the HHFKA is expected to fundamentally change the way school foodservice operates.

A.2 Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Study objectives. The purpose of this study is to implement a modular data collection system and collect routine data on specific aspects of the CNP, specifically on the program characteristics, administration, and operation of the programs. The findings from this study will

be used to identify program operational and policy issues, and topics for technical assistance and training. The research questions corresponding to each issue are detailed in Appendix A.

From whom the information will be collected. State Food Authority (SFA) and State CN directors will be the primary source of information for all data collected. The information will be collected from a nationally representative sample of approximately 2,188 SFA directors and a census of 55 State Child Nutrition directors. The participants are notified of the language in Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296, Sec. 305), requiring their cooperation in studies of CN programs. However, there is no mandatory requirement to complete a survey to continue participation in the CN programs or to receive any Federal benefits, making the completion of the survey voluntary.

How the information will be collected. The CN Director survey is web based. All FNS Regional Offices will be sent an email asking them to alert the State CN directors in their region about their important role in the CN-OPS II study (Appendix B1). All State Child Nutrition directors will then be mailed an invitation letter (Appendix B2), requesting their participation in the study. The mail package will include a hardcopy of the survey instrument (Appendix C) for planning purposes. The package will also contain instructions on how to access the web survey as well as information about our toll-free help line and our email help desk. The Help Desk number is 1-866-465-7738, and the email help desk address is CNSurveyHelp@2mresearch.com. Help will be provided by one of our professional interviewers during regular business hours. Given the breadth and depth of information to be collected through these surveys, respondents will be provided with the opportunity to save their progress and complete the survey in more

than one session. Approximately one week after the mailing, a reminder email will be sent to the CN directors who have not responded to the invitation letter (Appendix B3). This reminder email will confirm that the package arrived and include information on accessing the survey and the telephone and email help systems. The reminder email will be sent once every two weeks to the CN directors who have not completed their survey (Appendix B3). If the web survey is not completed within seven weeks after the initial questionnaire is received, trained interviewers will call CN directors and remind them to respond to the survey (Appendix B4.1). The interviewers will offer assistance if needed and offer to complete any modules that the director is ready to complete over the phone. Re-contact will occur weekly (Appendix B3, B4.1) until the end of the survey period at which time we will mail a thank you letter to the participants (Appendix B5). The data collection period for the survey of State Child Nutrition directors will span 10 weeks. If a respondent returns a completed hard copy of the survey, the responses will be entered into the database by the research team. From prior experience with web based surveys with telephone follow up, FNS expects that 90 percent of the responses will be received electronically.

The SFA Director survey is web based. Upon OMB approval, CN directors will be notified by email that 2M Research Services and Mathematica Policy Research will soon begin to contact the selected SFAs in their State (Appendix B6). All sampled SFA directors will be mailed an invitation letter (Appendix B7) requesting their participation in the study. The mail package will include a hardcopy of the survey instrument (Appendix D) for planning purposes. The package will also contain instructions on how to access the web survey as well as information about our toll-free help line and our email help desk. The Help Desk number is 1-866-465-7738, and the email help desk address is SFASurveyHelp@2mresearch.com. Help will be provided by one of our professional interviewers during regular business hours. Given the breadth and depth of

information to be collected through these surveys, respondents will be provided with the opportunity to save their progress and complete the survey in more than one session.

Approximately one week after the mailing, a reminder email will be sent to the SFA directors who have not responded to the invitation letter. This reminder email will confirm that the package arrived and include information on accessing the survey and the telephone and email help systems (Appendix B8). Reminder emails will be sent every one to two weeks for 8 weeks to the SFA directors who have not completed their survey (Appendix B8). If the web survey is not completed within eight weeks after the initial questionnaire is received, trained interviewers will call SFA directors and remind them to respond to the survey (Appendix B4.2). The interviewers will offer assistance if needed and offer to complete any modules that the director is ready to complete over the phone. Re-contact will occur weekly until the end of the survey period (Appendix B8, B4.2) at which time a thank you letter will be mailed to the participants (Appendix B9). The data collection for the survey of SFA directors will span 12 weeks.

Frequency of information collected. All State Child Nutrition Agencies and sampled SFAs will complete the respective survey once in SY 2015-16. (See Appendix C and D respectively for the two surveys).

Information shared with any other organizations inside or outside USDA or the government. The aggregated and analyzed data will be published and be available to the public. Again, all results will be presented in aggregated form in the final report made available in the research section of the USDA Food and Nutrition Service website

<http://www.fns.usda.gov/ops/research-and-analysis>.

A.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.

FNS is committed to complying with the E-Government Act of 2002, to promote the use of technology. The surveys of the State Child Nutrition directors and the SFA directors will be web surveys. The CN and SFA directors will be contacted by telephone to encourage and remind them to complete the survey and to try to get a commitment of a date by which they will complete the survey. Those that do not complete the web survey will be contacted by telephone, and data will be collected in an interviewer-administered (CATI) survey mode. Because the participants will receive a hard copy of the survey for planning purposes, there is a slight chance that someone may fill that out and return it. However, previous experience with web based surveys with telephone follow up indicate that 90 percent of the responses (approximately 10,805 responses) will be electronic--- either completed over the web or via CATI.

A.4 Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. Some questions in the survey have been drawn and modified from prior FNS studies. However, to our knowledge, there is no similar information available or being collected for the current timeframe.

A.5 If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Information being requested or required has been held to the minimum required for the intended use. Although smaller States and SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. FNS estimates that one percent of our respondents are small entities, approximately 33 respondents.

A.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.

The proposed data collection plan calls for data collection from SFA directors and State Child Nutrition directors once during the school year. Gathering such data is essential to track the characteristics of the CNP. In addition, ongoing changes to the programs are accompanied by parallel changes in administrative and operational issues. The nutritional well-being of our nation's youth, including health implications, has become an important policy issue. Collecting the information less frequently would obstruct the agency's ability to keep abreast of the issues in administration and operation of these programs, thereby delaying the discussion, formulation, and implementation of suitable policies.

A.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;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances. This collection of information is conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 5 CFR 1320.5.

A.8 If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

Notice of this study was published in the Federal Register on Wednesday, April 29, 2015 (Vol. 80, No. 82, pp 23768 - 23769). In response to the notice, FNS received a letter of endorsement from the School Nutrition Administration (SNA), supporting the goal of the data collection from the SFAs on the issues that impact child nutrition programs and the health and well-being of the students (Appendix E.1). FNS responded to the letter via email (Appendix E.2.)

A recommendation was made to allow the surveys to be completed piecemeal so that the SFA directors can complete the survey as their job duties permit. The online surveys allow the participants to save their effort, exit, and resume as often as needed to complete the survey.

A recommendation was also made for the State Agency survey to be multi-modal instead of only the paper version. The State survey, similar to the SFA survey, is delivered in multi-modal formats (online, paper and phone calls).

A recommendation was made for the inclusion of topics in the study such as the possible reasons for increased food costs, such as the availability of items, new nutrition standards and the impact of weather. This study includes several topics related to food costs, including possible reasons for increased food costs such as the requirement to meet the new nutritional standards. The survey also allows for the participant to include any other sources of increased costs that the participant believes to be important.

Recommendations were also made to include topics related to the overall financial health of programs, including food costs, labor and benefit costs and equipment in the survey. The survey includes questions that explore the overall fiscal health of the organization, including cost breakdown, in terms of labor costs, benefit costs, and equipment costs.

The commentator also recommended that the reasons for changes in student participation be explored. This study will collect information on student participation and several corollary policies that may impact participation, including questions about food wastage, inquiring which food groups are most wasted and why the SFAs believe they are wasted.

In response to the recommendation that topics on ways to streamline the administrative burden at the district and state level be looked at, the study includes questions on how different data collection systems are integrated such that they may decrease administrative effort, including integrated data systems that automate the application and verification procedures.

As recommended by the commentator, in order to assist USDA in providing some level of flexibility to better address the different needs of SFAs as per varying demographics, the study also includes questions about the percentage of students receiving free and reduced-price breakfast and lunches and participation in other means-tested programs. Demographic and geographic profiles of students will be constructed from secondary sources, including the FNS National Database and the National Center for Education Statistics' Common Core of Data (CCD) database.

a. Consultations outside the agency

In addition to soliciting comments from the public, FNS consulted with Jennifer Rhorer from National Agricultural Statistics Service (NASS) for expert consultation about the availability of data, the design, level of burden, and clarity of instructions for this collection.

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

The participants in the study will not receive an incentive payment.

A.10 Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

FNS complies with the Privacy Act of 1974. No confidential information is associated with the burden related to the analysis, implementation, and database maintenance and the reporting of Child Nutrition Program operations data by the State and School Food Authorities. The CN directors are informed that their personal information (name, telephone number etc.) will be kept private but that their responses about agency operations may be tabulated by State (Appendix B2). The SFA directors are informed that their personal information will be kept private and that their responses will only be used statistically in creating summary tabulations (Appendix B7). To insure that personal information remains private, the contract executed between FNS and 2M Research Services, LLC requires that the contractor create and keep data on secure networks and utilize data collectors that sign confidentiality agreements binding them to protect confidential and other private information. The contractor will assign a unique ID number to each response and provide FNS the data by this ID number. A separate file will associate the ID number with personal information. FNS will keep this file private. Once the contract is over, the contractor will destroy the files with private information.

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.

A.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 study does not contain questions of a sensitive nature.

A.12 Provide estimates of the hour burden of the collection of information. The statement should:

- **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.**

Table A1 shows the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials and the Agency's prior experience in collecting data.

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

Table A2 shows the estimated annualized cost to respondents. The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2014 National Occupational and Wage Statistics, NAICS Code 999001, and Occupational Group 11-9051 for SFA directors and Occupational Group 11-9000 for CN Directors. The hourly mean wage for 11-9051 (Food Service Managers) is \$27.26 per staff hour, the hourly mean wage for 11-9000 (Other Management Positions) is \$45.60 per staff hour.

Table A.1 Estimates of respondent burden

	Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-Responsive						
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Total Annual hour burden	
State / Local Government	State Directors	Hard copy pre-test	N/A	2	2	1	2	1	2	0	1	0	0.50	0	2.00	
	State Directors	Web-based Survey	C	55	55	1	55	1	55	0	1	0	0.08	0	55.00	
	State Directors	Invitation Letter	B2	55	22	1	22	0.05	1.1	33	1	33	0.00	0	1.10	
	State Directors	Follow-up email*	B3	33	13	1	13	0.05	0.65	20	1	20	0.00	0	0.65	
	State Directors	Reminder Email - Week 2*	B3	20	8	1	8	0.05	0.4	12	1	12	0.00	0	0.40	
	State Directors	Reminder Email - Week 4*	B3	12	5	1	5	0.05	0.25	7	1	7	0.00	0	0.25	
	State Directors	Reminder Email - Week 6*	B3	7	3	1	3	0.05	0.15	4	1	4	0.00	0	0.15	
	State Directors	Telephone Script - Week 7*	B4.1	4	2	1	2	0.083	0.167	2	1	2	0.00	0	0.17	
	State Directors	Telephone Script - Week 8*	B4.1	2	2	1	2	0.083	0.167	0	1	0	0.00	0	0.17	
	State Directors	Thank You Letter	B5	55	55	1	55	0.05	2.75	0	0	0	0.00	0	2.75	
	State Directors	Email Notification & FAQ	B6	55	55	1	55	0.05	2.75	0	0	0	0.00	0	2.75	
	SFA Directors	Hard copy pre-test	N/A	6	6	1	6	1.5	9	0	1	0	0.50	0	9.00	
	SFA Directors	Web-based Survey	D	2,188	1,750	1	1,750	2	3,500	438	1	438	0.083	36.50	3,536.50	
	SFA Directors	Invitation Letter	B7	2,188	656	1	656	0.05	32.80	1,532	1	1,532	0.00	0	32.80	
	SFA Directors	Follow-up email**	B8	1,532	383	1	383	0.05	19.15	1,149	1	1,149	0.00	0	19.15	
	SFA Directors	Reminder Email - Week 2**	B8	1,149	287	1	287	0.05	14.35	862	1	862	0.00	0	14.35	
	SFA Directors	Reminder Email - Week 5**	B8	862	129	1	129	0.05	6.45	733	1	733	0.00	0	6.45	
	SFA Directors	Reminder Email - Week 7**	B8	733	110	1	110	0.05	5.50	623	1	623	0.00	0	5.50	
	SFA Directors	Telephone Script - Week 8**	B4.2	623	93	1	93	0.083	7.75	530	1	530	0.00	0	7.75	
	SFA Directors	Telephone Script - Week 9**	B4.2	530	53	1	53	0.083	4.42	477	1	477	0.00	0	4.42	
	SFA Directors	Telephone Script - Week 10**	B4.2	477	39	1	39	0.083	3.25	438	1	438	0.00	0	3.25	
	SFA Directors	Thank You Letter	B9	1,750	1,750	1	1,750	0.05	87.50	0	0	0	0.00	0	87.50	
	TOTAL				2,251	1,813	3.02	5,478	0.686	3,755.55	1,532	4.48	6,860	0.005	36.50	3,792.05

*Based on 40 percent response rate for email and telephone reminders until target of 55 respondents are reached.

** Based on declining response rates on subsequent contacts until target of 1,750 respondents is reached. Initial response rate is 30%

Note: Appendix B1 is an email to FNS Regional Offices (not State or Local governments) and therefore has no burden.

Table A2. Annualized cost to respondents

Type of respondents	Type of survey instruments	Total Annual hour burden	Hourly Wage	Respondent Cost
State Directors	Hard copy pre-test	2.00	\$ 45.60	\$ 91.20
State Directors	Web-based Survey	55.00	\$ 45.60	\$ 2,508.00
State Directors	Invitation Letter	1.10	\$ 45.60	\$ 50.16
State Directors	Follow-up email	0.65	\$ 45.60	\$ 29.64
State Directors	Reminder Email - Week 2	0.40	\$ 45.60	\$ 18.24
State Directors	Reminder Email - Week 4	0.25	\$ 45.60	\$ 11.40
State Directors	Reminder Email - Week 6	0.15	\$ 45.60	\$ 6.84
State Directors	Telephone Script - Week 7	0.17	\$ 45.60	\$ 7.60
State Directors	Telephone Script - Week 8	0.17	\$ 45.60	\$ 7.60
State Directors	Thank You Letter	2.75	\$ 45.60	\$ 125.40
State Directors	Email Notification & FAQ	2.75	\$ 45.60	\$ 125.40
SFA Directors	Hard copy pre-test	9.00	\$ 27.26	\$ 245.34
SFA Directors	Web-based Survey	3,536.50	\$ 27.26	\$ 96,404.99
SFA Directors	Invitation Letter	32.80	\$ 27.26	\$ 894.13
SFA Directors	Follow-up email	19.15	\$ 27.26	\$ 522.03
SFA Directors	Reminder Email - Week 2	14.35	\$ 27.26	\$ 391.18
SFA Directors	Reminder Email - Week 5	6.45	\$ 27.26	\$ 175.83
SFA Directors	Reminder Email - Week 7	5.50	\$ 27.26	\$ 149.93
SFA Directors	Telephone Script - Week 8	7.75	\$ 27.26	\$ 211.27
SFA Directors	Telephone Script - Week 9	4.42	\$ 27.26	\$ 120.40
SFA Directors	Telephone Script - Week 10	3.25	\$ 27.26	\$ 88.60
SFA Directors	Thank You Letter	87.50	\$ 27.26	\$ 2,385.25
Total		3,792.05		\$ 104,570.41

A.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 items 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 other costs to respondents beyond those presented in section A.12.

A.14 Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal government is \$878,163.87. The largest cost to the federal government is to pay a contractor \$877,558.63 over a 19-month period to conduct Year 1 of the study and deliver data files and reports. This is based on an estimate of 9,036 hours, with a salary range of \$57.24– \$198.90/ hour. This contract cost includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items. This information collection also assumes a total of 6 hours of Federal employee time: for a GS-13, step 1 (FNS Headquarters) at \$43.52 per hour for a total of \$261.12 and 14 hours of Federal employee time: for GS-11, step 1 (FNS Regional Offices) at \$24.58 per hour for a total of \$344.12 on an annual basis, for a total cost of \$605.24. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2015. The Headquarters' rate is for Washington-Baltimore-Northern Virginia, while the Regional Office rate is the national base rate.

A.15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This submission is a new information collection request as a result of program changes and will add 3,792 burden hours and 12,338 responses to OMB's information collection inventory.

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

The first year of data collection will begin following OMB approval and run for approximately 12 weeks. Data file preparations will follow immediately so that data analysis can begin by June 1, 2016. The draft Year 1 report will be submitted to FNS by October 7, 2016, and presentation materials will be submitted by January 20, 2017.

There will be two types of products resulting from the analysis of data: Analytic data tables and a final report containing the results from both surveys.

Table A3. Data collection schedule

Activity	Due date
Pretest of SFA and State Director surveys	Aug 15-August 26, 2015
Data Collection (SFA Survey and State CN Director Survey)	Starting 1 week post OMB approval and lasting 13 weeks
Invitation letter to State CN Directors (Received)	1 week post OMB approval
Confirmation Email to CN Directors to verify receipt of survey package	2 weeks post OMB approval
Email reminder sent out to CN Directors	Starting 3 weeks post OMB approval and lasting 4 weeks
Telephone calls to State CN Directors to answer questions, remind them to complete the survey, and conduct survey	Starting 7 weeks post OMB approval and lasting 2 weeks
Thank you letters mailed to CN Directors	10 weeks post OMB approval
Invitation letter to SFA Directors (Received)	1 week post OMB approval
Confirmation Email to SFA Directors to verify receipt of survey package	2 weeks post OMB approval
Email reminder sent out to SFA Directors	Starting 3 weeks post OMB approval and lasting 5 weeks
Telephone calls to SFA Directors to answer questions, remind them to complete the survey, and conduct survey	Starting 9 weeks post OMB approval and lasting 3 weeks
Thank you letters mailed to SFA Directors	13 weeks post OMB approval
Data file preparation	13 weeks post OMB approval and lasting 9 weeks
Data Analysis and Reporting	22 weeks post OMB approval and lasting 20 weeks

a. Analysis of the Survey Data

The analysis of the Year 1 data will be cross-sectional in nature and provide a “snapshot” of the CNP characteristics and operations. Descriptive statistics including frequency distributions and cross tabulations will be generated for each research question; as appropriate for the research questions, analyses will be presented by school type, SFA size, poverty level, FNS Region, and other characteristics as appropriate. The subgroups based on SFA size and poverty level were defined as follows:

- SFA Enrollment size (0-2,499; 2,500-4999; 5,000-9,999; 10,000-99,999; 100,000-299,999; 300,000+); and
- Poverty level (60 percent or more free/reduced-price eligible students; less than 60 percent free/reduced-price eligible students).

We will develop a set of weights for analysis of data from the SFA Director Survey. The weights will be designed to produce nationally representative estimates of the SFA population at the time of the data collection (SY 2015-16). To construct appropriate nonresponse adjustment cells, we will use information from the FNS National Database and the National Center for Education Statistics’ CCD database.

b. Methods of Dissemination

A final report will be produced by the Contractor. The final report will be available in its entirety on the FNS website.

A.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.

A.18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

This study does not require any exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).