

SUPPORTING STATEMENT PART A FOR

0584-NEW Evaluation of the School Meal Data Collection Process

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Table of Contents

<u>Part</u>		<u>Page</u>
A	Justification.....	1
A.1	Circumstances making the collection of information necessary.....	1
A.2	Purpose and Use of the Information.....	2
A.3	Use of Information Technology and Burden Reduction.....	3
A.4	Efforts to Identify Duplication and Use of Similar Information.....	3
A.5	Impacts on Small Business or Other Small Entities.....	4
A.6	Consequences of Collecting the Information Less Frequently.....	4
A.7	Special Circumstances relating to the Guidelines of 5 CFR 1320.5.....	5
A.8	Responses to the <i>Federal Register</i> Notice and Efforts to Contact Outside Agencies.....	5
A.9	Explanation of Any Payment or Gift to Respondents.....	6
A.10	Assurance of Confidentiality Provided to Respondents.....	7
A.11	Justification for Sensitive Questions.....	7
A.12	Estimates of Respondent Burden Including Annualized Hourly Costs.....	8
A.13	Estimates of Other Total Annualized Cost Burden.....	10
A.14	Annualized Cost to the Federal Government.....	10
A.15	Explanation for Program Changes or Adjustments.....	11
A.16	Plans for Tabulation and Publication and Project Time Schedule.....	11
A.17	Reason Display of OMB Expiration Date is Inappropriate.....	11

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions.....	12
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Appendices

Appendix A: Study Materials

A-1. Richard B. Russell National School Lunch Act (as amended through P.L.113-79).

A-2. Westat IRB Approval Letter

A-3. Statement of Confidentiality and Nondisclosure

A-4. Burden Table

A-5. FNS-10 form

A-6. FNS-742 form

A-7. FNS-834 form

Appendix B: Recruitment Materials

B-1. Initial Study Notification E-Letter to all FNS Regional CN Directors

B-2. Initial Study Notification E-Letter to all FNS Regional SNAP Directors

B-3. Initial Study Notification E-Letter to all State CN Directors

B-4. Initial Study Notification E-Letter to all State SNAP Directors

B-5. State Selection Notification E-Letter From FNS to FNS Regional
Directors

B-6. State Selection Notification E-Letter From FNS to 4 Selected CN State
Directors

B-7. State Selection Notification E-Letter from FNS to 4 Selected SNAP State Directors

B-8. SFA Study Notification E-Letter

B-9. School Study Notification E-Letter

B-10. Contact Guide_previsit State CN

B-11. Contact Guide_onsite interviews

B-12. Study FAQs

Appendix C: Interview Protocols

C-1. State Child Nutrition Director Pre-Test Protocol

C-2. State Child Nutrition Director Pre-Test Protocol

C-3. State Child Nutrition Key staff Pre-Test Protocol

C-4. State SNAP Director Pre-Test Protocol

C-5. SFA Pre-Test Protocol

C-6. School Pre-Test Protocol

C-7. State Child Nutrition Guide - Pre-Visit

C-8. State Child Nutrition Director Guide

C-9. SNAP Director Guide

C-10. State-level Key Staff Guide-FNS 10

C-11. State-level Key Staff Guide- FNS 742 & FNS 834

C-12. School Food Authority Guide

C-13. School Food Manager Guide

Appendix D: Summary of Public Comments

D-1. Jean Publice Comments

D-2. Aryan Kamath Comments

D-3. School Nutrition Association Comments

D-4. Academy of Nutrition and Dietetics Comments

D-5. NASS Comment

Appendix E: Response to Public Comments

E-1. FNS Response to Jean Publicee

E-2. FNS Response to Aryan Kamath

E-3. FNS Response to School Nutrition Association

E-4. FNS Response to Academy of Nutrition and Dietetics

E-5. Response to NASS Comment

Part A Justification

A.1 Circumstances making the collection of information necessary

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new information collection request. The Food and Nutrition Service (FNS) is conducting this study to provide key information about methodologies and processes used to collect and report certain program data for the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The data collection is authorized under section 28(c) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1769i), the authorizing statute for the NSLP (Appendix A-1). Specifically, section 28(c) requires entities participating in the programs authorized under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771) to cooperate in the conduct of evaluations and studies. The NSLP and SBP are federally-funded meal programs operating in public and non-profit private schools and residential child care institutions. There were more than 30 million students in over 100,000 public and non-profit private schools and RCCIs receiving school lunches through the NSLP every school day in Fiscal Year (FY) 2016, with approximately 22 million receiving meals free or at a reduced price.¹ That same FY, 14.6 million students were served daily through the SBP, with 12.4 million of these students receiving free or reduced-price meals.² Together, these programs received approximately \$16.5 billion in federal funds in FY 2016.³

The Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) administers the NSLP and SBP at the Federal level. At the State level, State agencies, typically State Departments of Education or Agriculture, operate the

¹ <http://www.fns.usda.gov/sites/default/files/pd/slsummar.pdf>

² <http://www.fns.usda.gov/sites/default/files/pd/sbsummar.pdf>

³ <https://www.fns.usda.gov/sites/default/files/pd/cncost.pdf>

programs through agreements with Local Educational Agencies (LEAs). FNS administers and provides directives for the programs, including reporting requirements. FNS collects program data for the NSLP and SBP via the *FNS-10: Report of School Operations* (Appendix A-5), the *FNS-742: SFA Verification Collection Report* (Appendix A-6); and the *FNS-834: State Agency Direct Certification Rate Data Element Report* (Appendix A-7).⁴

The proposed evaluation will provide a detailed description of how data elements are compiled for the FNS-10, FNS-742, and FNS-834 at the school or site, School Food Authority (SFA) and State levels. The evaluation will also identify potential sources of error when completing these forms, and provide FNS with recommendations for improving the data collection process to improve the accuracy of data. Accuracy of the data is paramount due to its use in making and evaluating policy decisions throughout the programs. FNS has contracted with Westat to carry out this scope of work.

A.2 Purpose and Use of the Information

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.

The primary purpose of this voluntary one time data collection is to provide a description and evaluation of the methodologies and processes used to collect and report program data via the FNS-10, FNS-742, and FNS-834 forms. The key research objectives relate to assessing how (State, Local & Tribal Agencies which includes): schools/sites, SFAs, and States in four selected States handle three functions: collect/aggregate data, process or validate data, and transmit data about the school meal programs. The ultimate objective is to understand the likely sources of error within each of these functions at each reporting level (i.e.,

⁴ FNS-10 Report of School Operations, OMB Control #: 0584-0594, expiration 06/2019. FNS-742 SFA Verification Collection Report, OMB Control #: 0584-0594, expiration 06/2019. FNS-834 State Agency Direct Certification Rate Data Element Report, OMB Control#: 0584-0594, expiration 06/2019.

school/site to SFA; SFA to State agency; State agency to FNS). Evaluation of the processes and identification of potential sources of error will culminate in a set of recommended practices for improving the process to increase the accuracy of school meal program data. There is currently no other effort that can address the research objectives of the proposed study. Specifically, the study will:

1. Document the process schools and SFAs use when submitting data used for the FNS-10;
2. Document the process SFAs use when completing the FNS-742;
3. Document the process States use when compiling data for and completing the FNS-10, FNS-742, and FNS-834; and
4. Develop a set of recommended practices for accurately completing the FNS-10, FNS-742, and FNS-834.

The study will include 4 State agency Directors of Child Nutrition and several of their key staff; 4 State agency Directors of the Supplemental Nutrition Assistance Program (SNAP); 10 SFA Directors in each of the 4 States, and 3 cafeteria managers in each SFA. The following will be used as State selection criteria:

1. **State Size.** We will examine data from the FNS-10 on the number of NSLP and SBP meals, the number of SFAs and schools, total enrollment, and free and reduced-price certifications.
2. **Geography.** We will select States in at least three different FNS regions to ensure any regional office differences are reflected in the case studies.
3. **Use and Type of Management Information System (MIS).** This will include commercial vendor vs. in-house system and whether SFA MIS systems are separate or integrated into the State's MIS system.
4. **Direct Certification Systems and Performance.** We will look at the most recent direct certification performance rates for each State as well as whether the States have a State-based or local-based direct certification process.
5. **Processes and procedures important to FNS,** as indicated through our review of relevant guidance and key informant interviews with FNS staff. For example, selection criteria such as States with very low or very high diversity in Point of Sale (POS) systems, variation among MIS vendors and/or SFAs that are district managed vs. managed by a food

service management company.

6. **FNS Assessment of State Reporting Performance.** We will seek to ensure a range of performance levels.

In preparation for study launch, interview guides were pre-tested to ensure that: (1) respondents interpret the questions as intended and can easily respond; and (2) interviewers can easily administer the instruments. Pre-test interviews were conducted by telephone among a total of 6 respondents: one State Child Nutrition Director, one SNAP Operations and Policy Analyst, one School Nutrition State Manager, one School Nutrition Fiscal Analyst, one SFA Director and one school cook manager. Interviews ranged from 22-61 minutes. Feedback from the pre-test interviews was used to refine questions that respondents found confusing, repetitive or ambiguous, as well as questions that interviewers found challenging to administer. The pre-test interviews also gave the team a better understanding of the division of responsibility among State and local staff, which will improve respondent recruitment for the study.

On behalf of FNS, Westat's trained interviewers will gather data using in-depth interviews (both on-site and via telephone). Interviews include questions to address the research objectives discussed above.

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.

FNS is committed to complying with the E-Government Act of 2002, to promote the use of technology. No portion of this data collection will be conducted electronically. This study primarily involves in-person, on-site interviews with designated key staff at State agencies, SFAs and schools; there is no requirement for study participants to complete any surveys. To the extent possible, contacts to arrange the on-site interviews will first be made over the phone and any additional communication will be made via email (Appendix B-10, B-11), and a short pre-visit interview with the State agency director will be conducted by phone (Appendix C-7) to reduce participant burden and reduce the burden of on-site data collection (Appendices C8-C13).

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

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. Through careful review of the data requirements, we have determined that no current data are similar to that proposed for collection in this study. Further, this study does not ask respondents to report data that has already been reported to FNS on the FNS-10, FNS-742 and FNS-834. There is another FNS study currently underway that complements the objectives of this study. The *Access, Participation, Eligibility, and Certification (APEC) III* study⁵ will provide new, nationally-representative estimates of error

⁵ Descriptions of FNS studies can be viewed at <http://www.fns.usda.gov/ops/research-and-analysis>. The Third Access, Participation, Eligibility and Certification Study is currently under FNS development. OMB Control #0584-0530, expiration date to be determined.

rates in NSLP and SBP, by the major sources of program errors. No data exist on the processes in place to enable program reporting.

A.5 Impacts Small Business or other Small Entities

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

About half of the 40 SFAs selected may be considered small entities.⁶ Although smaller SFAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. For all respondents, information being requested or required has been held to the minimum required for the intended use.

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.

This is a voluntary one-time data collection activity. If the study is not conducted at this time, FNS will not have information on processes used to collect and report program data via the FNS-10, FNS-742, and FNS-834 forms. The information is essential for policy makers and program staff making decisions about program design to best understand the likely sources of error within each of these functions at each reporting level (i.e., school/site to SFA; SFA to State agency; State

⁶ For these purposes, a small SFA is considered one with fewer than 500 enrolled students.

agency to FNS). We will use the information to develop recommended practices for improving the process to increase the accuracy of school meal program data.

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;**
- **In connection with a statistical surveys, 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 relating to the Guidelines of 5 CFR 1320.5. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A.8 Responses to the Federal Register Notice and Efforts to Contact Outside Agencies

If applicable, 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.

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 form, and on the data elements to be recorded, disclosed, or reported.

In accordance with 5 CFR 1320.8(d), FNS published a notice on January 5, 2017, in the *Federal Register*, Volume 82, Number 3, Pages 1312-1314, and provided a 60-day period for public comments (see Appendix A-4). On March 6, FNS received a total of four comments which are detailed in Appendices D1-D4. The comments were related to: 1) the burden of data collection at school, LEA and State-level agencies with specific emphasis on smaller districts; 2) improving the nutritional quality and taste of school lunches; and 3) administration and eligibility of those participating in school food programs. FNS responses to each comment are in Appendices E1-E4.

Six respondents served as participants in the pre-test efforts and were consulted about the burden estimate and other characteristics of the collection (i.e., clarity of instruments): one State Child Nutrition Director, one SNAP Operations and Policy Analyst, one School Nutrition Manager, one School Nutrition Fiscal Analyst, one SFA Director and one school cook manager. These respondents were under a confidentiality agreement and told their information (such as names) would not be shared. Additional consultants included Brent Farley, Mathematical Statistician with the National Agricultural Statistical Service's Summary, Estimation, and Disclosure Methodology Branch, 202-690-8122 and Ted Macaluso, independent technical advisor, 571-214-9658. Consultations about the research design, sample design, data sources and needs, and study reports occurred during the study's planning and design phase, and will continue throughout the study.

A.9 Explanation of Any Payment or Gift to Respondents

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

There will be no incentives provided to respondents in this study.

A.10 Assurance 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.

Study participants will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC §552a), which requires the safeguarding of individuals against invasion of privacy; these safeguards will have been documented in an informed consent form found at the start of each interview guide (Appendices C1-C6). In addition, all Westat project staff have signed a confidentiality and nondisclosure agreement (Appendix A-3). We will safeguard the privacy and security of electronic data during the data collection and processing period following the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports, published in the *Federal Register* on April 25, 1991 (56 FR 19078). Names and phone numbers will not be linked to participants' responses and analysis will be conducted on data sets that include only respondent ID numbers. All data will be securely transmitted to Westat via secure fax, FTP site, prepaid sealed mailings, or phone; and will be stored in locked file cabinets or password-protected computers, and accessible only to Westat project staff. Names and phone numbers will be destroyed within 12 months after the end of the collection and processing period (approximately 03/2020). Westat's Institutional Review Board (IRB) is the organization of record overseeing all human subjects' activities for the study. A copy of the IRB approval letter is in Appendix A-2.

A.11 Justification for Sensitive Questions

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.

In general, questions on completing forms and transmitting data are not considered to be sensitive. Participants can choose to skip any question, or to discontinue participation in the study with no penalties. The majority of questions required for the interviews were pre-tested (Appendix C-1 thru C-7) and no participants expressed unwillingness to answer the questions.

A.12 Estimates of Respondent Burden Including Annualized Hourly Cost

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.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**
- FNS affected public for this data collection is across 4 selected States. FNS plans to send out 100 Introductory Electronic Study Notification Letters (Appendix B3 and B4) to 50 CN Directors and 50 SNAP Directors.

We will collect information about the FNS-10, FNS-742 and FNS-834 forms from these various respondent types: 50 State Child Nutrition Directors, 20 State Child Nutrition key staff, 50 State SNAP Directors, 2

State SNAP key staff, 47 SFA Directors and 120 school cafeteria managers. The burden table below and Appendix A-4 present the number of respondents, frequency of response, and annual hour burden to collect these data. All participant burden (regardless of title) includes time to read communication materials, schedule a pre-visit and on-site interview, participate in the pre-visit and on-site visit interview as well as follow-up to the interview. The burden table also includes the instrument pre-testing efforts that were conducted with one State Child Nutrition Director, one SNAP Operations and Policy Analyst, one School Nutrition Manager, one School Nutrition Fiscal Analyst, one SFA Director and one school cook manager.

- **State Child Nutrition Directors.** The sample size of State Child Nutrition Directors is 50; FNS anticipates 4 will fully participate.
- **State Child Nutrition Key Staff.** A total of 20 key staff will complete an on-site in-depth interview. 20 key staff will participate in the on-site interviews intended specifically for key staff who are involved with the FNS-10, FNS-742 and/or FNS-834.
- **State SNAP Directors.** The sample size of State SNAP Directors is 50 and we estimate 4 will fully participate.
- **State SNAP Key Staff.** Approximately 2 key staff (50 percent of State SNAP on-site interviews) will join the State SNAP Director to complete the State SNAP Director on-site in-depth interview.

- **SFA Directors.** The sample size of SFA Directors is 47. We anticipate a total of 40 SFA Directors will participate in the study, with seven declining due to various reasons.
- **School Cafeteria Managers.** The sample size of school cafeteria managers is 120.

The estimates of respondent cost are based on the burden estimates and use the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Occupational and Wage Statistics. Both Occupational Group (999200) State Government (excluding schools and hospitals) and Occupational Group (611000) Educational Services (including private, state, and local government schools) were used to estimate annualized costs for managers or directors at the State agencies, SFAs, and schools. Annualized costs were based on the mean hourly wage for each job category.

The hourly wage rate used for the State CN Director, State SNAP Director and key staff is \$43.82 (Occupation Code 11-9030, State Government-999200).⁷ The hourly wage rate used for the SFA director is \$39.34 (Occupation Code 11-9039-611000). The hourly wage rate used for food service (cafeteria) manager in schools is \$29.97 (Occupation Code 11-9051, Food Service Manger-611000).⁸ The State CN Director, State SNAP Director and key staff total 55.2 burden hours which is \$2,418.86. The SFA directors total 75.1 burden hours which is \$2,954.43 and the school cafeteria managers total 160 burden hours which equates to \$4,795.20 (see Appendix A-4 for burden hours).The total estimated annualized cost is \$10,168.49.

No respondents will be asked to keep records of data; therefore no burden hours have been estimated for recordkeeping.

⁷ https://www.bls.gov/oes/current/naics4_999200.htm#11-0000

⁸ https://www.bls.gov/oes/current/naics3_611000.htm#11-0000

Affected Public	Type of respondents	Instruments	Sample Size ^a	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)	Grand Total Annual Burden Estimate (hours)	
State Child Nutrition Agency	State Director	Electronic pre-test invitation	1	1	1	1	0.050	0.1	0	0	0	0.000	0.0	0.1	
		Scheduling the pre-test interview	1	1	1	1	0.167	0.2	0	0	0	0.000	0.0	0.2	
		Conducting the pre-test interview	1	1	1	1	1.000	1.0	0	0	0	0.000	0.0	1.0	
		Introductory Electronic Study Notification Letter	50	50	1	50	0.050	2.5	0	0	0	0.000	0.0	2.5	
		Electronic Study Notification Letter (among selected)	4	4	1	4	0.167	0.7	0	0	0	0.000	0.0	0.7	
		Scheduling the pre-visit interview	4	4	1	4	0.167	0.7	0	0	0	0.000	0.0	0.7	
		Scheduling the on-site in-depth interview	4	4	1	4	0.167	0.7	0	0	0	0.000	0.0	0.7	
		State Child Nutrition Agency Director Pre-visit in-depth interview	4	4	1	4	0.750	3.0	0	0	0	0.000	0.0	3.0	
		State Child Nutrition Agency Director in-depth interview	4	4	1	4	0.500	2.0	0	0	0	0.000	0.0	2.0	
		State Child Nutrition Agency Director in-depth interview follow up	1	1	1	1	0.167	0.2	0	0	0	0.000	0.0	0.2	
	Key Staff	Electronic pre-test invitation	3	3	1	3	0.050	0.2	0	0	0	0.000	0.0	0.2	
		Scheduling the pre-test interview	3	3	1	3	0.167	0.5	0	0	0	0.000	0.0	0.5	
		Conducting the pre-test interview	3	3	1	3	1.000	3.0	0	0	0	0.000	0.0	3.0	
		Electronic Study Notification Letter	20	20	1	20	0.167	3.3	0	0	0	0.000	0.0	3.3	
		Scheduling the on-site in-depth interview	20	20	1	20	0.167	3.3	0	0	0	0.000	0.0	3.3	
		State Child Nutrition Agency Key Staff in-depth interview	20	20	1	20	1.500	30.0	0	0	0	0.000	0.0	30.0	
		State Child Nutrition Agency Key Staff in-depth interview Follow-Up	5	5	1	5	0.167	0.8	0	0	0	0.000	0.0	0.8	
			Electronic pre-test invitation	1	1	1	1	0.050	0.1	0	0	0	0.000	0.0	0.1

Affected Public	Type of respondents	Instruments	Sample Size ^a	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)	Grand Total Annual Burden Estimate (hours)
State Supplemental Nutrition Assistance Program (SNAP) Agency	State Director	Scheduling the pre-test interview	1	1	1	1	0.167	0.2	0	0	0	0.000	0.0	0.2
		Conducting the pre-test interview	1	1	1	1	1.000	1.0	0	0	0	0.000	0.0	1.0
		Introductory Electronic Study Notification Letter	50	50	1	50	0.050	2.5	0	0	0	0.000	0.0	2.5
		Electronic Study Notification Letter (among selected)	4	4	1	4	0.167	0.7	0	0	0	0.000	0.0	0.7
		Scheduling the on-site in-depth interview	4	4	1	4	0.167	0.7	0	0	0	0.000	0.0	0.7
		State SNAP Agency Director in-depth interview	4	4	1	4	1.000	4.0	0	0	0	0.000	0.0	4.0
	State SNAP Agency Director in-depth interview Follow Up	1	1	1	1	0.167	0.2	0	0	0	0.000	0.0	0.2	
	Key Staff	Electronic Study Notification Letter	2	2	1	2	0.167	0.3	0	0	0	0.000	0.0	0.3
		Scheduling the on-site in-depth interview	2	2	1	2	0.167	0.3	0	0	0	0.000	0.0	0.3
State SNAP Agency Director in-depth interview		2	2	1	2	1.000	2.0	0	0	0	0.000	0.0	2.0	
State Government Sub-Total			127	127	1.73	220	0.291	63.9	0	0	0	0.000	0.0	63.9
School Food Authority	SFA Director	Electronic pre-test invitation	1	1	1.00	1	0.050	0.1	0	0	0	0.000	0.0	0.1
		Scheduling the pre-test interview	1	1	1.00	1	0.167	0.2	0	0	0	0.000	0.0	0.2
		Conducting the pre-test interview	1	1	1.00	1	1.000	1.0	0	0	0	0.000	0.0	1.0
		Electronic Study Notification Letter	47	40	1	40	0.167	6.7	7	1	7	0.167	1.2	7.9
		Scheduling the on-site in-depth interview	47	40	1	40	0.167	6.7	7	1	7	0.167	1.2	7.9
		School Food Authority Director in-depth interview (includes consent)	40	40	1	40	1.500	60.0	0	0	0	0.000	0.0	60.0
		School Food Authority Director in-depth interview Follow Up	10	10	1	10	0.167	1.7	0	0	0	0.000	0.0	1.7
School	Cafeteria Manager	Electronic pre-test invitation	3	1	1	1	0.050	0.1	2	1	2	0.050	0.1	0.2

Affected Public	Type of respondents	Instruments	Sample Size ^a	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)	Grand Total Annual Burden Estimate (hours)
		Scheduling the pre-test interview	3	1	1	1	0.167	0.2	2	1	2	0.167	0.3	0.5
		Conducting the pre-test interview	1	1	1	1	0.750	0.8	0	0	0	0.000	0.0	0.8
		Electronic Study Notification Letter	120	120	1	120	0.167	20.0	0	0	0	0.000	0.0	20.0
		Scheduling the on-site in-depth interview	120	120	1	120	0.167	20.0	0	0	0	0.000	0.0	20.0
		School Cafeteria Manager in-depth interview (includes consent)	120	120	1	120	1.000	120.0	0	0	0	0.000	0.0	120.0
Local Government Sub-Total			171	162	3.06	496	0.478	237.2	9	2.00	18	0.133	2.4	239.6
GRAND TOTAL			298	289	2.48	716	0.421	301.1	9	2.00	18	0.133	2.4	303.5

Notes:

SFA Director number of non-respondents assumes an eighty five percent response rate
Based on previous qualitative studies at Westat, we assume a 25% follow up rate with respondents

Footnotes:

Sample size numbers are rounded to the nearest whole number

A.13 Estimates of Other Total Annualized Cost Burden

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 capital/start-up or ongoing operation/maintenance costs associated with this information collection.

A.14 Annualized Cost to the Federal Government

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 annual cost for this data collection is \$339,201.20. The overall total cost to the Federal Government is \$1,017,603.60 over the 30 month period of the contract. The largest cost to the Federal Government is to pay the contractor \$995,802.00 to conduct this study and deliver reports and data files. The information collection also assumes a total of 480 hours of a Federal Employee's time per year: for a GS-13, Step 1 in the Washington, DC area, at \$45.42 per hour for a total of \$21,801.60. Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2017 for the Washington, DC, metro area locality (for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA).⁹

⁹ Office of Personnel Management, General Schedule, accessed February 21, 2017, at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf

A.15 Explanation for Program Changes or Adjustments

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

This is a new information request which will add 303.5 total annual burden hours and 734 total annual responses to FNS burden 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.

Table A16.1 shows the data collection, analysis & coding, and reporting schedules for the final briefing and report.

Table A16.1. Reporting Schedule

Activity	Schedule
Instrument Pre-testing	1 week after OMB approval
Select Data Collectors	2 weeks after OMB approval
Train Data Collectors	4-6 weeks after OMB approval
Conduct Data Collection	8-26 weeks after OMB approval
Analyze Data	12-36 weeks after OMB approval
Draft, Revised and Final Reports	38-42 weeks after OMB approval
Draft, Revised and Final Briefing Materials	54 weeks after OMB approval
Delivery of data files	56 weeks after OMB approval

A.17 Reason Display of OMB Expiration Date is Inappropriate

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

All data collection instruments will display the OMB control number and expiration date.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this study.