

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-[NEW]:

Summer Food Service Program Integrity Study

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A1. 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.

This is a new information collection request. The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) is conducting the Summer Food Service Program (SFSP) Integrity Study to provide information about the administration and oversight of the SFSP, and identify potential barriers to ensuring the integrity and effective management of the SFSP. The study will inform FNS resources, training, and technical assistance pertaining to the SFSP.

Congress created the SFSP in 1968 to ensure that low-income children continue to receive nutritious meals when school is not in session and they do not have access to free or low-cost meals through the National School Lunch (NSLP) and School Breakfast Programs (SBP). The SFSP provides free meals and snacks to children in areas with high concentrations of low-income households with children, primarily in the summer months from May to September. FNS administers the SFSP at the Federal level. State agencies administer the program through agreements with sponsors, including school food authorities (SFAs), local government agencies, camps, and private non-profit organizations. Sponsors oversee the program at one or more eligible sites that serve the meals. Sites are located in a variety of settings such as schools, churches, parks, playgrounds, community and recreation centers, and camps.

Several laws aim to improve the integrity of the Federal government's payments and the efficiency of its programs and activities. The Improper Payments Elimination and Recovery Act of 2010 (Public Law 111-204) and the Improper Payments Elimination and Recovery Improvement Act of 2012 (Public Law 112-248) set forth the priority, mandate, and requirements for Federal agencies, such as FNS, to review programs and activities every three years to identify those that

may be vulnerable to significant improper payments (Appendixes A-1 and A-2). If results identify any programs as high-risk, agencies are required to provide valid annual estimates of improper payments.

While FNS's assessments of the SFSP in April 2014 and May 2017 concluded that it is at low risk for improper payments, recent efforts to address summer food insecurity through improving access to SFSP have increased program expenditures. Increased program expenditures may lead to increased risk of improper payments. Additionally, SFSP presents unique challenges to ensuring program integrity and measuring improper payments. By their nature, many SFSP sites are much less structured than other meal programs,¹ which may make training and monitoring more challenging. Finally, the USDA Office of Inspector General recently reviewed SFSP to determine whether its controls were sufficient and found several areas for improvement (see Appendix A-6).²

Research on how States, sponsors, and sites monitor the SFSP and ensure program integrity is scarce. Likewise, there is little information about how to measure improper payments under the SFSP. FNS is pursuing this SFSP Integrity Study to obtain that information, and inform the development of resources and technical assistance for the SFSP.

The SFSP is authorized under Section 13(a) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1761) (Appendix A-3). For studies of the Child Nutrition Programs, including the SFSP, Section 28(c) of the Richard B. Russell National School Lunch Act (the Act) (42 U.S.C. 1769i) (Appendix A-4) requires *organizations* participating in the programs authorized under the Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771), to cooperate in the conduct of evaluations and studies. However, as explained in the respondent consent language in the data

¹ SFSP offers flexibility with regard to where meals may be served (e.g., schools, parks, churches, apartment complexes), how meals are prepared (e.g., sites receive meals from a vendor, from their sponsor, or the sponsor prepares meals on-site), and other factors. Furthermore, sponsors may oversee different types of sites (e.g., open, restricted open, closed enrolled), and may follow different procedures to train and monitor each site type.

² FNS Controls Over Summer Food Service Program, Audit Report 27601-0004-41. This audit is the first phase of a three-phase audit on controls over SFSP.

collection instruments (Appendixes C-2, C-3, C-4, and C-5), an *individual's* participation in data collection activities is voluntary, and there is no penalty for non-participation.

A2. 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 primary purpose of this voluntary, one-time data collection is to describe how States, sponsors, and sites administer and monitor the SFSP, and any challenges they face. Specifically, under the study we will:

1. Examine and describe how State agencies administer and provide SFSP oversight and why they believe it is effective;
2. Identify SFSP integrity challenges common across States and types of sites in the administration and oversight of the SFSP; and
3. Identify existing or State-recommended resources, training, or technical assistance that would better support State agencies in their effective administration and monitoring of the SFSP.

FNS' Office of Policy Support and Child Nutrition Programs is pursuing this study to better understand how the SFSP is monitored by States, sponsors, and sites. The results will inform FNS' development of resources and technical assistance, as well as any future efforts to estimate improper payment rates in the SFSP. There is currently no other effort that can address the research objectives of the proposed study. This study will culminate in written reports on the processes, challenges, and resources to administer and oversee the SFSP. Results of the study will be made available to the public and all government entities (both internal and external to the USDA) via the FNS website.

The study includes a web survey and telephone interviews with key informants who

administer the program. Data will be collected first via an online survey of the 54 State Child Nutrition (CN) Directors that oversee the SFSP (Appendix C-2), followed by in-depth telephone interviews with a purposive sample of 18 State CN Directors (Appendix C-3). Each State CN Director may choose to invite up to two key staff to participate in the telephone interview, for a total of 36 State-level key staff (two from each of the 18 States), because those staff may have a more detailed understanding of certain processes than the Directors do and the discussion would benefit from their involvement. Following the State-level data collection, telephone interviews will be conducted with 48 SFSP sponsor directors. Similar to the State-level interviews, the sponsor directors may choose to invite one additional key staff to participate in the telephone interview, for a total of 48 key sponsor staff. Following the sponsor-level data collection, telephone interviews will be conducted with 48 SFSP site supervisors. All interview respondents will be purposively selected to represent diverse characteristics such as type, size and experience. Table A2-1 lists the data collection instruments, the source of the information, and the key information gathered by each instrument.

Table A2-1. Instrument Specification

Source	Instruments	Key information
State CN Directors and Key Staff	<ul style="list-style-type: none"> • State Director Web Survey (Appendix C-2) • State Director Interview Guide (Appendix C-3) 	<ul style="list-style-type: none"> • State and sponsor policies and processes • Program integrity challenges • SFSP resources and training
SFSP Sponsor Directors and Key Staff	<ul style="list-style-type: none"> • Sponsor Interview Guide (Appendix C-4) 	<ul style="list-style-type: none"> • Sponsor and site policies and processes • Program integrity challenges • SFSP resources and training
SFSP Site Supervisors	<ul style="list-style-type: none"> • Site Supervisor Interview Guide (Appendix C-5) 	<ul style="list-style-type: none"> • Site policies and processes • Program integrity challenges • SFSP resources and training

In the following sections we describe the data being collected from each respondent, how

we will collect it, and the recruitment procedures. More detailed information on sampling and data collection is available in Part B of this supporting statement.

All telephone interviews will be led by a trained researcher who will administer the State Director Interview Guide (Appendix C-3), the Sponsor Interview Guide (Appendix C-4) and the Site Supervisor Interview Guide (Appendix C-5). Prior to beginning the interview, the interviewer will request the participant's consent to participate in the interview, using language found at the start of the interview guides. Verbal consent is appropriate given that the interviews will be conducted by telephone. With the participants' consent, we will audio-record interviews and take detailed written notes.

State CN Directors

A basic description of States' processes to administer and oversee the SFSP will be collected using a web survey of all 54 State CN Directors, and the telephone interviews will explore the issues in greater depth with 18 selected State CN Directors and their key staff. The survey will collect information on the timing, modes, and content of the training and resources that States provide on the SFSP; the process to consider and approve organizations as SFSP sponsors and sites; how States monitor the SFSP, and what they look for during on-site visits and reviews of sponsors and sites; the number of sponsors and sites that stop participating in the SFSP, and the reasons behind those decisions; and the challenges States face in administering and monitoring the SFSP. The telephone interviews will explore these issues in greater depth, and probe to understand States' perspectives on the most effective strategies to ensure program integrity and effective management of the SFSP.

The survey will take no more than 20 minutes to complete, and the State CN Directors will be permitted to share the login information with colleagues who may possess a more detailed

knowledge of day-to-day SFSP operations. The telephone interview will not exceed 90 minutes.

All 54 State CN Directors will receive the Study Notification E-Letter from FNS to State CN Directors (Appendix B-3) informing them of the study purpose, objectives, activities and expected timeframes. FNS will attach to the notification email an FAQ for States and SFSP Sponsors (Appendix B-4) that elaborates on the purpose of the study and how respondents were selected. When the State Director Web Survey (Appendix C-2) is ready to be launched, within two weeks of OMB approval, the study team will send the E-Letter to State CN Directors with Link to Web Survey (Appendix B-5) to ask State Directors to complete the online survey, and provide a PIN and login instructions. We will attach the FAQ for States and SFSP Sponsors (Appendix B-4) to that email invitation. We will send a weekly reminder email to nonrespondents, using the E-Letter Survey Reminder (Appendix B-6), and follow up by phone if needed at the end of the six-week period using the Phone Script for Nonrespondent State Directors (Appendix B-7). Following completion of the survey, we will send the E-Letter Thank You for Survey Completion (Appendix B-8) to the States not selected for subsequent telephone interviews. For the State Directors whom we select to include in telephone interviews, we will send the Survey Thank You E-Letter with Request to Schedule Phone Interview (Appendix B-9). Following the completion of the telephone interview, the State Directors will receive the State Interview Thank You E-Letter with Request to Contact Selected Sponsors (Appendix B-10). Attached to that email will be the Study Notification E-Letter to Sponsors from State CN Agency (Appendix B-11) and FAQ for States and SFSP Sponsors (Appendix B-4), which we will ask the States to send to the sponsors within their States who are selected for telephone interviews.

SFSP sponsor directors

Interviews with SFSP sponsor directors will provide greater insight into the administration

and monitoring of the SFSP at the local level. Sponsors oversee the sites where program meals are provided to children, and they are responsible for receiving and reviewing the meal counts from each site before submitting the information to the State. We will interview 48 sponsor directors across the 18 States selected for interviews, 24 from local government agencies (e.g., school districts) and 24 from private or non-profit businesses. These interviews will collect data on how organizations apply to be SFSP sponsors; the training they receive from the State and the training they provide to their sites; the processes to monitor SFSP sites and ensure they are complying with program regulations; the processes to verify the meal count data submitted by sites; and program integrity challenges. Interviews with SFSP sponsor directors will not exceed 60 minutes, and the directors will be permitted to invite one key staff to participate in the interview.

Using the Study Notification E-Letter to Sponsors from State CN Agency (Appendix B-11) noted above, the 18 interviewed State Directors will email the sponsors in their States selected for telephone interviews to notify them of the study purpose, activities, and timeframe. We will provide the State Directors with the FAQ for States and SFSP Sponsors (Appendix B-4) that they can attach to the notification email to sponsors to better explain the purpose of the study and how respondents were selected. We have found in prior studies that States greatly assist in the recruitment of SFSP sponsors by emailing them to encourage their participation. One week after States reach out to their sponsors, we will send the sponsor directors the E- Letter to Sponsors with Request to Schedule Phone Interview and include the FAQ for States and SFSP Sponsors (Appendixes B-12 and B-4, respectively). We will follow up with an E-Letter Reminder to Schedule Sponsor Interview (Appendix B-13) to those who are unresponsive. Following the interview, we will send the Sponsor Interview Thank You E-Letter and Request to Contact Selected SFSP Sites (Appendix B-14), which will include the Study Notification E-Letter to Selected SFSP Sites from SFSP Sponsor (Appendix B-15) and the FAQ for SFSP Sites (Appendix

B-16) as attachments.

SFSP site supervisors

Interviews with SFSP site supervisors will provide information on how sites actually operate the meal program, the challenges they face, and how they are monitored by their sponsor and State. We expect to select one site from each of the 48 sponsors interviewed. The interviews with site supervisors will collect information on the following: the training site staff received to operate the program; their processes to record and submit the daily count of meals served to eligible children; and sites' experiences with program monitoring (e.g., health and sanitation inspections, sponsor or State monitoring visits). Interviews with SFSP site supervisors will not exceed 30 minutes.

In the Sponsor Interview Thank You E-Letter and Request to Contact Selected SFSP Sites (Appendix B-14) noted above, we will provide the 48 interviewed sponsor directors with a Study Notification E-Letter to Selected SFSP Sites from SFSP Sponsor (Appendix B-15) that they can send to the selected SFSP sites whom we would like to recruit to participate in site interviews. This e-letter will notify them of their selection into the study, and describe the study purpose, activities, and timeframes, and will include the FAQ for SFSP Sites (Appendix B-16). We have determined through prior studies that sponsors can assist with the recruitment of sites by emailing their sites to encourage their participation. One week after sponsors reach out to their sites, we will send an E-letter to Site Supervisor to Schedule Phone Interview (Appendix B-17), with the FAQ for SFSP Sites (Appendix B-16) as an attachment. Site supervisors will receive an E-letter Reminder to Schedule Site Interview (Appendix B-18) if they have not responded within one week. Following the interview, we will send the site supervisors a Site Supervisor Interview Thank You E-Letter (Appendix B-19).

A3. 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. Respondent burden will be reduced through the use of information technology for data collection to the extent possible. The State Director Web Survey (Appendix C-2) will be web-based, and the State Director Web Survey Screen Shots may be found in Appendix C-6. We expect that all 54 State agencies will complete the survey electronically. Out of a total of 1,903 responses (1,070 for respondents and 833 for non-respondents) for this collection, we estimate that 54 responses (3 percent) will be submitted electronically via the web survey.

A4. 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.

FNS solely administers and monitors the SFSP. 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 they have already reported to FNS. No data exist on how the various entities (States, sponsors, and sites) monitor and oversee the SFSP, and the challenges they face.

A5. 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.

We expect that up to one-third of the sponsors and sites that we will select and recruit for interviews will qualify as small entities. Although small sponsors and sites are involved in this data collection effort, they deliver the same program benefits and perform the same function as any

other sponsor or site. For all respondents, we will limit requests for information to the minimum required for the intended use. As noted earlier, we will conduct all interviews by telephone to minimize burden on respondents, and we offer a data collection window of approximately two months for both sponsors and sites to provide maximum scheduling flexibility. Interviews with sponsors and sites are shorter in duration than interviews with States, lasting no more than 60 and 30 minutes, respectively. Out of the total 617 respondents for this collection, we estimate that 162 (26 percent) will be from small entities.

A6. 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 we do not conduct this study at this time, FNS will not have information on how States, sponsors, and sites administer and oversee the SFSP or the program integrity challenges encountered, which would be used to help FNS to develop and refine its resources and technical assistance. Additionally, without the results of this study, FNS will not have sufficient information to help them conduct possible future estimates of improper payments in the SFSP, as required by the Improper Payments Elimination and Recovery Act of 2010 (Public Law 111-294) and the Improper Payments Elimination and Recovery Improvement Act of 2012 (Public Law 112-248) (Appendix A-1 and Appendix A-2, respectively).

A7. 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 relating to the Guidelines of 5 CFR 1320.5. We are conducting the collection of information in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. 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.

In accordance with 5 CFR 1320.8(d), FNS published a notice on March 7, 2019, in the *Federal Register*, Volume 84, Number 45, pages 8295-8300, and provided a 60-day period for public comments. The public comment period ended on May 6, 2019. FNS received a total of four comments, provided in Appendixes D1 through D4. Appendixes E1 through E4 includes FNS' responses to the comments.

All commenters acknowledged the importance of the SFSP in addressing children's

nutritional needs. One commenter noted the importance of including a diverse group of SFSP sponsors in the study. Another commenter stressed the importance of using State CN Directors as the primary contact at the State, and only contacting additional State personnel with the Director's approval. The same commenter suggested that the study reduce the burden on respondents by testing the data collection instruments before using them in the field, and also by allowing respondents to submit requested information in the original format (i.e., not requiring them to re-format an existing spreadsheet). The commenters also suggested six additional lines of inquiry for the study, including: 1) student and household experiences with the SFSP; 2) strategies to streamline the SFSP; 3) best practices to reach eligible children; 4) the impact of recent Summer Meals policy rescissions; 5) feedback on FNS's guidance for SFSP providers that also participate in other CN programs; and 6) excessive or outdated administrative requirements.

In responding to the comments, FNS emphasized the importance of balancing the need for sufficient data to answer the research questions while also minimizing the burden on respondents. In response to the comment about including a diverse group of SFSP sponsors, FNS provided details on how a diverse and purposive group of sponsors will be selected to represent different characteristics of interest. For the commenter concerned about the recruitment of State-level staff, FNS provided details about the proposed data collection plan, wherein the State CN Director is the primary point of contact, and the Director will decide whether to include additional staff. To the same commenter, who requested that all data collection instruments be tested and that respondents be allowed to submit data in the original format, FNS provided information about the pre-tests conducted and clarified that respondents will not be asked to provide raw data for the study.

Finally, in response to the suggestions for additional lines of inquiry, FNS informed one commenter that their suggestion to explore excessive or outdated administrative requirements was

incorporated into the study by adding questions to the Sponsor Interview Guide (Appendix C-4). Other commenters were informed that their suggestions fall outside the scope of this study. However, FNS also disclosed that the first suggestion to explore student and household experiences with the SFSP is part of a separate FNS study currently underway, the Summer Food Service Program Participant Characteristics and Meal Analysis of Quality (SFSP PC MAQ) Study.

The NASS reviewer, Dr. Edwin L. Anderson, had no suggestions for changes to the documentation (Appendix E-5). He said the supporting statements clearly define the project and methodology that will be used.

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.

In addition to the public input on the Notice, the study team asked the four members of its study Peer Advisory Panel (PAP) to review and provide input on the study design and burden: Kelley Chanay, Assistant Director, Child Nutrition and Wellness, Kansas State Department of Education, (785) 296-2276; Chris Greenwood, Community Programs Manager, City of Rockford Human Services, (779) 348-569; Keven Vicknair, Executive Director, Equal Heart, (469) 526-3645; and Daniel Miller, Associate Professor, Boston University School of Social Work, (617) 353-3752. Specifically, all four members of the PAP provided written feedback on the draft study plan, including flagging potential challenges to recruitment and data collection strategies. The study plan was revised to incorporate their feedback and recommendations. Additionally, Kelley Chanay provided edits to the State web survey, which were incorporated into the final version of the instrument. Consultations about the research design, sample design, data sources and needs, and

reporting will continue throughout the study.

A9. 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.

A10. 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 the informed consent form language found at the start of the State Director Web Survey (Appendix C-2), as well as the State Director Interview Guide (Appendix C-3), the Sponsor Interview Guide (Appendix C-4), and the Site Supervisor Interview Guide (Appendix C-5). We will safeguard the privacy and security of electronic and hard copy 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). We will not link identifying information to participants' responses. Survey responses will be submitted on a secure web site managed by the study contractor. The contractor stores data in locked file cabinets or password-protected computers, made accessible only to contractor project staff. We will destroy names and phone numbers within 12 months after the end of the collection and processing period (approximately 11/2021). The contractor's Institutional Review Board (IRB) is the organization of record overseeing all human subjects' activities for the study. On October 13, 2018, the IRB determined that the study does not qualify as human subjects research, and is therefore exempt from further IRB review. A copy of the IRB Approval Letter is in Appendix A-5.

This study does not collect any personally identifiable information nor do any of the forms require a Privacy Act Statement. All research staff will be required to sign a Statement of Confidentiality and Nondisclosure (Appendix A-7) prior to data collection.

A11. 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.

There are no questions of a sensitive nature included in this information collection.

A12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

This is a new information collection. With this submission, there are 617 respondents, 1,903 total annual responses, and 379 total annual burden hours. We expect all respondents to respond to at least one recruitment effort. We expect that all States will participate in the State Director Web Survey (Appendix C-2) and the State Director Interview (Appendix C-3). Based on our experience from other studies, we expect that 25 percent of sponsors (48 of the 192 contacted) and 20 percent of sites (48 of the 240 contacted) will participate in an interview. The average number of responses per respondent is 3.08.³ Burden estimates reflect consultations with program officials, affected stakeholders, and prior experience in collecting similar data.

The affected public for this data collection includes State and Local Governments (State CN

³ Rounded to the nearest tenth.

agencies and half of the SFSP sponsors and sites) and Profit/Non-Profit Businesses (the other half of the SFSP sponsors and sites). The study expects the following number of respondents in each respondent category:⁴

- **State and Local Governments:** This includes the universe of 54 States (represented by State CN Directors and State CN key staff) that administer the SFSP,⁵ 96 SFSP sponsors (represented by sponsor directors and key staff), and 120 SFSP sites (represented by site supervisors), and 3 respondents for the pre-test, for a total of 273 respondents representing State and local governments. All 54 State CN directors are expected to complete the State Director Web Survey (Appendix C-2). We expect that 18 of them (and up to two key staff per State) will also participate in the telephone interview that uses the State Director Interview Guide (Appendix C-3). While 96 SFSP sponsors representing local government agencies will receive the Study Notification E-Letter to Sponsors from State CN Agency (Appendix B-11), only 10 people are expected to respond while 86 will not. A reminder letter (Appendix B-13) will be sent to the 86 who did not respond to that first request. Of those, 14 additional people will respond and 72 will not. There will be 24 sponsors (including directors and one of their key staff) who are expected to participate in the interview – 10 who responded to that initial email request and 14 who responded to the reminder request. Out of the total 96 SFSP Sponsors contacted for the interview, FNS estimates 24 will participate, while 72 will not respond. Likewise, while 120 SFSP site supervisors representing local government agencies will receive the Study Notification E-letter to Selected SFSP Sites from SFSP Sponsor (Appendix B-15), only 24 are expected to

⁴ Based on our experience with recruitment for a similar study, we expect to recruit significantly more sponsors and sites than we will ultimately interview. To determine the number of respondents we need to recruit we multiplied our target number of 48 SFSP sponsors by a factor of four, and our target number of 48 SFSP sites by a factor of five.

⁵ 50 U.S. States, the District of Columbia, Guam, Puerto Rico and Virgin Islands

participate in the interview - 10 who responded to that initial email request and 14 who responded to the E-Letter reminder (Appendix B-18). Therefore, FNS estimates that out of the total 120 SFSP Site Supervisors, 24 will participate in the interview while 96 will not respond.

- **Businesses (Profit/Non-profit):** While 96 SFSP sponsors representing profit/non-profit businesses will receive the Study Notification E-Letter to Sponsors from State CN Agency (Appendix B-11), only 10 people are expected to respond while 86 will not. A reminder letter (Appendix B-13) will be sent to the 86 who did not respond to that first request. Of those, 14 additional people will respond and 72 will not. There will be 24 sponsors (including directors and one of their key staff) who are expected to participate in the interview – 10 who responded to that initial email request and 14 who responded to the reminder request. Out of the total 96 SFSP Sponsors, FNS estimates that 24 will participate in the interview, while 72 will not respond. Likewise, while 120 SFSP site supervisors representing profit/non-profit businesses will receive the Study Notification E-Letter to Selected SFSP Sites from SFSP Sponsor (Appendix B-15), only 24 are expected to participate in the interview - 10 who responded to that initial email request and 14 who responded to the E-Letter reminder (Appendix B-18). Therefore, out of the total 120 SFSP Site Supervisors, FNS estimates that 24 will participate in the interview and that 96 will not respond.

The burden for all respondents is broken down in detail in Table A12-1 and in the Burden Table in Appendix A-8.

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

The estimates of respondent cost are based on the burden estimates and use mean hourly wage rates from the U.S. Department of Labor, Bureau of Labor Statistics, May 2018 National Occupational and Wage Statistics. We used Occupational Group (999200) State Government (excluding schools and hospitals) to estimate annualized costs for managers or directors at the State agencies. We used Occupational Group (611000) Educational Services (including private, state, and local government schools) to estimate annualized costs for managers or directors at the SFSP sponsors and sites. We used the mean hourly wage for each job category to estimate annualized costs.

The hourly wage rate used for the State CN Director and State key staff is \$45.16 (Occupation Code 11-9030, State Government-999200, https://www.bls.gov/oes/2018/may/naics4_999200.htm#11-0000). The hourly wage rate used for the director and key staff of SFSP sponsors from local government institutions is \$42.57 (Occupation Code 11-9039, Educational Services-611000, https://www.bls.gov/oes/2018/may/naics3_611000.htm). The hourly wage rate used for the director and key staff of SFSP sponsors from profit/non-profit businesses is \$29.06 (Occupation Code 21-1000, Educational Services-611000, https://www.bls.gov/oes/2018/may/naics3_611000.htm#21-0000). The hourly wage rate used for SFSP site supervisors is \$21.27 (Occupation Code 21-1090, Educational Services-611000, https://www.bls.gov/oes/2018/may/naics3_611000.htm#21-0000). The total burden to all State and Local Government staff totals 253.1 hours,⁶ which is \$10,208.39.⁷ Of that burden to State and Local Government staff, the State share is 126.8 burden hours, which is \$5,724.50; the share for sponsors and site staff from local government institutions total 126.4 burden hours, which is \$4,483.90. The sponsors and site staff from profit/non-profit businesses

⁶ The total annualized burden hours for all respondents are rounded to the nearest tenth.

⁷ The total annualized costs for all respondents are rounded to the nearest hundredth.

total 125.9 burden hours, which is \$3,321.97. The initial estimated annualized cost is \$13,530.36. To account for fully-loaded wages, an additional \$4,465.02 (33% of \$13,530.36) was added to the initial cost, for a total estimated annualized cost of \$17,995.38.

Table A12-1. Annual Burden Table

Respondent category	Type of respondents	Appendix	Instruments	Sample size ^a	Responsive					Non-Responsive					Grand total annual burden estimate (hours)	Hourly Rate	Total Annualized Cost
					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)			
State Child Nutrition (CN) Agency	State Director	B-3 (B-4 attached)	Study Notification E-Letter from FNS to State CN Directors; FAQ for States and SFSP Sponsors (attachment)	54	54	1	54	0.17	9.0	0	0	0	0.00	0.0	9.0	45.16	407.25
		B-5 (B-4 attached)	E-Letter to State CN Directors with Link to Web Survey; FAQ for States and SFSP Sponsors (attachment)	54	14	1	14	0.17	2.3	40	1	40	0.03	1.2	3.5	45.16	159.78
		B-6	E-Letter Survey Reminder #1	40	10	1	10	0.02	0.2	30	1	30	0.02	0.5	0.7	45.16	30.17
		B-6	E-Letter Survey Reminder #2	30	10	1	10	0.02	0.2	20	1	20	0.02	0.3	0.5	45.16	22.63
		B-6	E-Letter Survey Reminder #3	20	10	1	10	0.02	0.2	10	1	10	0.02	0.2	0.3	45.16	15.08
		B-6	E-Letter Survey Reminder #4	10	5	1	5	0.02	0.1	5	1	5	0.02	0.1	0.2	45.16	7.54
		B-7	Phone Script for Nonrespondent State Directors	5	5	1	5	0.17	0.8	0	0	0	0.00	0.0	0.8	45.16	37.71
		C-2	State Director Web Survey	54	54	1	54	0.33	18.0	0	0	0	0.00	0.0	18.0	45.16	814.51
		B-8	E-Letter Thank You for Survey Completion (States not selected for interviews)	36	36	1	36	0.02	0.6	0	0	0	0.00	0.0	0.6	45.16	27.15

		B-9	Survey Thank You E-Letter with Request to Schedule Phone Interview	18	18	1	18	0.17	3.0	0	0	0	0.00	0.0	3.0	45.16	135.75
		C-3	State Director Interview Guide	18	18	1	18	1.50	27.0	0	0	0	0.00	0.0	27.0	45.16	1,219.32
		B-10 (B-4 and B-11 attached)	State Interview Thank You E-Letter with Request to Contact Selected Sponsors (attachments: Study Notification E-Letter to Sponsors from State CN Agency; FAQ for States and SFSP Sponsors)	18	18	1	18	0.42	7.5	0	0	0	0.00	0.0	7.5	45.16	338.97
	State Key Staff	B-1	State and Sponsor Instrument Pre-Test Request	1	1	1	1	0.05	0.1	0	0	0	0.00	0.0	0.1	45.16	2.26
		C-1	Pre-test Interview Protocol	1	1	1	1	1.50	1.5	0	0	0	0.00	0.0	1.5	45.16	67.74
		C-3	State Director Interview Guide	36	36	1	36	1.50	54.0	0	0	0	0.00	0.0	54.0	45.16	2,438.64
State Government Sub-Total				131	91	3.19	290	0.43	124.5	40	2.63	105	0.02	2.3	126.8		5,724.50
SFSP Sponsor	Director	B-1	State and Sponsor Instrument Pre-Test Request	2	2	1	2	0.05	0.1	0	0	0	0.00	0.0	0.1	42.57	4.27
		C-1	Pre-Test Interview Protocol	2	2	1	2	1.50	3.0	0	0	0	0.00	0.0	3.0	42.57	127.71

		B-11 (B-4 attached)	Study Notification E-Letter to Sponsors from State CN Agency; FAQ for States and SFSP Sponsors (attachment)	96	96	1	96	0.17	16.0	0	0	0	0.00	0.0	16.0	42.57	682.48
		B-12 (B-4 attached)	E-Letter to Sponsors with Request to Schedule Phone Interview; FAQ for States and Sponsors (attachment)	96	10	1	10	0.17	1.7	86	1	86	0.03	2.6	4.3	42.57	180.92
		B-13	E-Letter Reminder to Schedule Sponsor Interview	86	14	1	14	0.05	0.7	72	1	72	0.03	2.2	2.9	42.57	121.81
		C-4	Sponsor Interview Guide	24	24	1	24	1.00	24.0	0	0	0	0.00	0.0	24.0	42.57	1,021.68
		B-14 (B-15 and B-16 attached)	Sponsor Interview Thank You E-Letter and Request to Contact Selected SFSP Sites (attached: Study Notification E-Letter to Selected SFSP Sites from SFSP Sponsor; FAQ for SFSP Sites document)	24	24	1	24	0.42	10.1	0	0	0	0.00	0.0	10.1	42.57	429.11
	Key Staff	C-4	Sponsor Interview Guide	24	24	1	24	1.00	24.0	0	0	0	0.00	0.0	24.0	42.57	1,021.68
SFSP Site	Supervisor	B-2	Site Supervisor Instrument Pre-Test Request	1	1	1	1	0.05	0.1	0	0	0	0.00	0.0	0.1	21.27	1.07
		C-1	Pre-test Interview Protocol	1	1	1	1	1.00	1.0	0	0	0	0.00	0.0	1.0	21.27	21.27
		B-15 (B-16)	Study Notification	120	120	1	120	0.17	20.0	0	0	0	0.00	0.0	20.0	21.27	

		attached)	E-Letter to Selected SFSP Sites from SFSP Sponsor; FAQ for SFSP Sites (attachment)															426.25
		B-17 (B-16 attached)	E-Letter to Site Supervisor to Schedule Phone Interview; FAQ for SFSP Sites (attachment)	120	10	1	10	0.17	1.7	110	1	110	0.03	3.3	5.0	21.27		105.71
		B-18	E-Letter Reminder to Schedule Site Interview	110	14	1	14	0.05	0.7	96	1	96	0.03	2.9	3.6	21.27		76.18
		C-5	Site Supervisor Interview Guide	24	24	1	24	0.50	12.0	0	0	0	0.00	0.0	12.0	21.27		255.24
		B-19	Site Supervisor Interview Thank You E-Letter	24	24	1	24	0.02	0.4	0	0	0	0.00	0.0	0.4	21.27		8.53
Local Government Sub-Total				243	75	5.20	390	0.30	115.4	168	2.17	364	0.03	10.9	126.4			4,483.90
State, Local, and Tribal Government Sub-Total				374	166	4.10	680	0.35	239.9	208	2.25	469	0.03	13.2	253.1			10,208.39
SFSP Sponsor	Director	B-1	State and Sponsor Instrument Pre-Test Request	1	1	1	1	0.05	0.1	0	0	0	0.00	0.0	0.1	29.06		1.46
		C-1	Pre-test Interview Protocol	1	1	1	1	1.50	1.5	0	0	0	0.00	0.0	1.5	29.06		43.59
		B-11 (B-4 attached)	Study Notification E-Letter to Sponsors from State CN Agency; FAQ for States and SFSP Sponsors (attachment)	96	96	1	96	0.17	16.0	0	0	0	0.00	0.0	16.0	29.06		465.89
		B-12 (B-4 attached)	E-Letter to Sponsors with Request to Schedule Phone Interview; FAQ for States and Sponsors (attachment)	96	10	1	10	0.17	1.7	86	1	86	0.03	2.6	4.3	29.06		123.51

		B-13	E-Letter Reminder to Schedule Sponsor Interview	86	14	1	14	0.05	0.7	72	1	72	0.03	2.2	2.9	29.06	83.15
		C-4	Sponsor Interview Guide	24	24	1	24	1.00	24.0	0	0	0	0.00	0.0	24.0	29.06	697.44
		B-14 (B-15 and B-16 attached)	Sponsor Interview Thank You E-Letter and Request to Contact Selected SFSP Sites (attached: Study Notification E-Letter to Selected SFSP Sites from SFSP Sponsor; FAQ for SFSP Sites document)	24	24	1	24	0.42	10.1	0	0	0	0.00	0.0	10.1	29.06	292.92
	Key Staff	C-4	Sponsor Interview Guide	24	24	1	24	1.00	24.0	0	0	0	0.00	0.0	24.0	29.06	697.44
SFSP Site	Supervisor	B-2	Site Supervisor Instrument Pre-Test Request	2	2	1	2	0.05	0.1	0	0	0	0.00	0.0	0.1	21.27	2.13
		C-1	Pre-test Interview Protocol	2	2	1	2	1.00	2.0	0	0	0	0.00	0.0	2.0	21.27	42.54
		B-15 (B-16 attached)	Study Notification E-Letter to Selected SFSP Sites from SFSP Sponsor; FAQ for SFSP Sites (attachment)	120	120	1	120	0.17	20.0	0	0	0	0.00	0.0	20.0	21.27	426.25
		B-17 (B-16 attached)	E-Letter to Site Supervisor to Schedule Phone Interview; FAQ for SFSP Sites (attachment)	120	10	1	10	0.17	1.7	110	1	110	0.03	3.3	5.0	21.27	105.71
		B-18	E-Letter Reminder to Schedule Site Interview	110	14	1	14	0.05	0.7	96	1	96	0.03	2.9	3.6	21.27	76.18
		C-5	Site Supervisor Interview Guide	24	24	1	24	0.50	12.0	0	0	0	0.00	0.0	12.0	21.27	255.24
		B-19	Site Supervisor	24	24	1	24	0.02	0.4	0	0	0	0.00	0.0	0.4	21.27	

			Interview Thank You E- Letter														8.53
Profit/Non-Profit Business Sub-total				243	75	5.20	390	0.29	114.9	168	2.17	364	0.03	10.9	125.9		3,321.97
	TOTAL			617	241	4.44	1,070	0.33	354.9	376	2.22	833	0.03	24.1	379.0		13,530.36

Footnotes:

Annual burden hours are rounded to the nearest tenth.

Based on our experience with a similar study, we multiplied our target number of SFSP sponsors by a factor of 4 to determine the number needed to recruit.

Based on our experience with a similar study, we multiplied our target number of SFSP sites by a factor of 5 to determine the number needed to recruit.

A Frequently Asked Questions (FAQ) sheet will be attached to the first email that every respondent receives on the study; the time burden includes the time to read that attachment.

A13. 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/maintenance costs associated with this information collection.

A14. 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 total cost of this data collection to the Federal Government is \$1,291,273.95 over the 36-month period of the contract or \$430,424.65 annually. This includes annual contractor costs of \$399,961.66 and fully loaded annual FNS staff costs of \$30,462.99. The largest cost to the Federal Government is to pay the contractor \$1,199,885.00 (\$399,961.66 annually) to conduct this study and deliver reports and data files. The information collection also assumes a total of 416 hours of a Federal Employee's time per year for a GS-13, Step 1 in the Washington, DC area, at \$49.19 per hour for a total of \$20,463.04 per year. The information collection also assumes a total of 42 hours of a Branch Chief's time per year: for a GS-14, Step 1 in Washington, DC area, at \$58.13 per hour for a total of \$2,441.46 per year. Adding \$7,558.49 to account for fully loaded wages (\$22,904.50 x 0.33), total Federal employee costs per year are estimated at \$30,462.99. Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2020 for the Washington, DC, metro area locality.

A15. 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, which will add 379 total

annual burden hours and 1,903 total annual responses to FNS’ burden inventory as a program change.

A16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

The survey data will be analyzed using descriptive and bivariate analyses in order to paint a picture of SFSP administration and monitoring processes, training and technical assistance, and integrity challenges, as well as within defined subgroups (e.g., States of different SFSP program sizes). A series of analytic tables and figures will be produced to illustrate the steps of the processes used to provide oversight, where challenges arise, and any variations by subgroup.

An inductive and iterative approach will be used to analyze the qualitative interview data. Under this approach, we will systematically identify the themes and learning as they emerge from our review of the data, rather than commencing data collection and analysis with hypotheses already in hand. The qualitative interview transcripts will be coded and analyzed using NVivo, a qualitative data analysis software. Data results will be tabulated for the interview data.

The findings will be synthesized and published in a technical final report form as well as a summary report for the general public – both of which will be posted on the FNS website. The final report will address all research objectives. The findings will also be submitted as a manuscript to a journal for consideration and publication. Table A16-1 provides the approximate timeline for data collection, analysis and publication activities.

Table A16-1. Study Timeline

Activity	Dates
FNS Sends Study Notification E-Letter to State Agencies	Immediately following OMB clearance

Activity	Dates
Data Collection - State CN Director Survey	Starting 2 weeks after OMB approval and lasting 6 weeks (May – July 2020)
Data Collection – State Interviews	August – September 2020
Data Collection – Sponsor Interviews	October – November 2020
Data Collection – Site Interviews	November – December 2020
Data Analysis	July – December 2020
Data File Preparation (restricted and public-use)	June – October 2021
Reporting (final report, journal article, public-facing summary report)	October – November 2021

A17. 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.

A18. 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. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.