

## Memorandum

**Date:** September 27, 2019

**To:** James Crowe, OMB Desk Officer, Food and Nutrition Service

**Through:** Christina Sandberg, Food and Nutrition Service, Information Collection Clearance Officer, Planning and Regulatory Affairs; [C.S.](#)  
Ruth Brown, United States Department of Agriculture, Office of the Chief Information Office, Department Clearance Officer

**From:** Katie Del Rosario  
Food and Nutrition Service, Food Safety Specialist, Office of Food Safety

**Re:** Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval for Collection of Produce Safety University Course Feedback and Program Impact Data

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval for formative research under approved Generic OMB Clearance No. 0584-0524 Generic Clearance to Conduct Formative Research.

This request is to acquire clearance to collect voluntary student feedback on the Produce Safety University training program. Produce Safety University (PSU) is a one-week training course designed to help Child Nutrition Professionals and State Agency personnel identify and manage food safety risks associated with fresh produce. The PSU program is designed to be a train-the-trainer immersion course, where participants are expected to conduct further training with the information they obtain. The PSU curriculum covers all aspects of the fresh produce supply chain from growing and harvesting, to storage and preparation, through a combination of lecture, laboratory, and field-trip instruction.

Feedback collected will be used to identify high priority training needs, determine effectiveness of course material and delivery method, and determine program impact post-training.

The following information is provided for your review:

1. **Title of the Project:** Collection of Produce Safety University Course Feedback and Program Impact Data
2. **Control Number:** 0584-0524, Expires xx/xx/20xx
3. **Public Affected by this Project:**  
State and Local/Tribal Employees identified below.
  - Child Nutrition Professionals employed at schools or daycares that participate in FNS Child Nutrition Programs.

- Farm to School Coordinators employed at schools, daycares, or State Agencies.
- State Agency employees involved in administration of FNS Child Nutrition Programs, food distribution, produce procurement, or food safety training. The majority of State Agency employees are from a State Department of Education or State Department of Agriculture.

See section 7, *Project Purpose, Methodology & Formative Research Design*, for a description of the number of each audience type.

#### 4. Number of Respondents:

Table 4.1 – Collection Activity by Audience

Audience	# of Participants	# of Responders	% of Responders	# of non-responders	% of non-responders
<b>Welcome Questions</b>					
Child Nutrition Professionals <sup>1</sup>	123	74	60%	49	40%
Farm to School Coordinators <sup>2</sup>	5	3	60%	2	40%
State Agency Staff <sup>3</sup>	78	47	60%	31	40%
<b>Total</b>	<b>206</b>	<b>124</b>	<b>60%</b>	<b>82</b>	<b>40%</b>
<b>Course Evaluation</b>					
Child Nutrition Professionals	123	104	85%	19	15%
Farm to School Coordinators	5	4	80%	1	20%
State Agency Staff	78	70	90%	8	10%
<b>Total</b>	<b>206</b>	<b>178</b>	<b>86%</b>	<b>28</b>	<b>14%</b>
<b>6-month follow-up Program Impact Evaluation</b>					
Child Nutrition Professionals	123	31	25%	92	75%
Farm to School Coordinators	5	1	20%	4	80%
State Agency Staff	78	12	15%	66	85%
<b>Total</b>	<b>206</b>	<b>44</b>	<b>21%</b>	<b>162</b>	<b>79%</b>
	<sup>1</sup> Calculated as 2.4 participants per each of the 50 States plus 3 participants from the U.S. territories. Note that some States will choose to send 3 Child Nutrition Professionals, and others 2 or less, so to account for the differences among States we are estimating 2.4 participants/State. <sup>2</sup> Calculated as 0.10 participants per each of the 50 States. Note that some States will choose to send a Farm to School Coordinator and some will not. Historically we have had less than 5 per year. <sup>3</sup> Calculated as 1.5 participants per each of the 50 States plus 3 participants from the U.S. territories. Note that some States will choose to send 1 State Agency representative, some will send 0, and some will send 2. Therefore, we attempted to account for the differences between States by rounding to 1.5 participants/State.				

**5. Time Needed Per Response:**

Table 5.1 - Time Needed for Collection Activities by Audience\*

Audience	Collection Activity	Time (minutes)	Time (hours)
Child Nutrition Professionals	Welcome Questions	10	0.17
	Course Evaluation	15	0.25
	6-month follow-up Program Impact Evaluation	20	0.33
	<b>Total</b>	45	
Farm to School Coordinators	Welcome Questions	10	0.17
	Course Evaluation	15	0.25
	6-month follow-up Program Impact Evaluation	20	0.33
	<b>Total</b>	45	
State Agency Staff	Welcome Questions	10	0.17
	Course Evaluation	15	0.25
	6-month follow-up Program Impact Evaluation	20	0.33

\*The time is an average response per respondent.



6. **Total Burden Hours on Public:** 154.5 burden hours and 618 responses. Please note that the number of respondents should be 178 and the number of non-respondents 28. These totals are the sum of the unique respondents or non-respondents who either respond to the collection or whom never respond to the collection at all. This is not a sum of all of the respondents in this column so these totals represent either all of the unique respondents all of the unique respondents who respond to the collection or those who will not respond at all.

Table 6.1 Total Burden Hours on Public

(a) Affected Public	(b) Collection Activity	(c) Appendix	(d) # of Participants <sup>1</sup>	Respondents					Non-Respondents					(o) TOTAL Burden Hours		
				(e) # of Respondents	(f) Frequency of Responses	(g) Est. Total Annual Responses per Respondent (e x f)	(h) Hours per Response	(i) Total Burden Hours	(j) # of Non-respondents	(k) Frequency of Responses (were they to respond)	(l) Est. Total Annual Responses per Respondent (j x k)	(m) Hours per Response (were they to respond)	(n) Total Burden Hours			
State and Local/Tribal Employees	Child Nutrition Professionals	Welcome Questions	A	123	74	1	74	0.17	12.58	49	1	49	0.17	8.33	20.91	
	Farm to School Coordinators		A	5	3	1	3	0.17	0.51	2	1	2	0.17	0.34	0.85	
	State Agency Staff		A	78	47	1	47	0.17	7.99	31	1	31	0.17	5.27	13.26	
	<b>Subtotal</b>				206	124		124		21.08	82		82		13.94	35.02
	Child Nutrition Professionals	Course Evaluation	B	123	104	1	104	0.25	26	19	1	19	0.25	4.75	30.75	
	Farm to School Coordinators		B	5	4	1	4	0.25	1	1	1	1	0.25	0.25	1.25	
	State Agency Staff		B	78	70	1	70	0.25	17.5	8	1	8	0.25	2	19.5	
	<b>Subtotal</b>				206	178		178		44.5	28		28		7	51.5
	Child Nutrition Professionals	6-month follow-up Program Impact Evaluation	C	123	31	1	31	0.33	10.23	92	1	92	0.33	30.36	40.59	
	Farm to School Coordinators		C	5	1	1	1	0.33	0.33	4	1	4	0.33	1.32	1.65	
	State Agency Staff		C	78	12	1	12	0.33	3.96	66	1	66	0.33	21.78	25.74	
	<b>Subtotal</b>				206	44		44		14.52	162		162		53.46	67.98
	<b>Total Agency Burden</b>				206	346		346		80.1	272		272		74.4	154.5

<sup>1</sup> The same 206 people will be asked to complete all 3 collection activity forms. We are expecting varying rates of response depending on collection activity and affected public sub-population. A 100% total response rate would result in 618 total responses across all 3 collection activities combined. We are assuming a 56% total response rate.

**(b) Project Purpose, Methodology, and Formative Research Design:**

Background

The USDA Food and Nutrition Service (FNS) administers the nutrition assistance programs for the United States Department of Agriculture (USDA). The mission of FNS is to provide students and low resource families better access to food and a more healthful diet through its nutrition assistance programs. Among these programs are the Child Nutrition Programs, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP). The FNS Office of Food Safety's mission is to protect people served by FNS programs from foodborne illness. This is done by developing food safety education, training, and technical assistance resources to support FNS program operators.

As authorized under Section 21 of the Richard B. Russell National School Lunch Act, 42 USC, FNS provides training and technical assistance for school foodservice. Under this initiative, FNS is offering a week-long training course, Produce Safety University, to Child Nutrition program operators and State Agency staff.

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 authorized funding for federal school meal and child nutrition programs and increased access to healthy food for low-income children. The HHFKA included provisions to ensure the safety of school foods like improving recall procedures and extending hazard analysis and food safety requirements for school meals throughout the campus.

As mandated by the HHFKA, USDA published a Final Rule "Nutrition Standards in the National School Lunch and School Breakfast Programs" that updated and aligned the meal patterns and nutritional standards with the Dietary Guidelines for Americans. This rule required most schools to increase their availability of fruits and vegetables. Increased funding was provided through the USDA Fresh Fruit and Vegetable Program and Farm-to-School initiatives and school gardens increased. This raised concerns about potential food safety risks associated with these programs.

As a result, Produce Safety University (PSU) was piloted in 2010 as a collaborative venture between USDA Food and Nutrition Service (FNS) and USDA Agricultural Marketing Service (AMS). The PSU course was officially launched in 2011 and has been offered yearly since. PSU is a one-week, training course designed to help school foodservice staff identify and manage food safety risks associated with fresh produce. The PSU course is designed to be a train-the-trainer immersion course, where participants are expected to conduct further training with the information they obtain. The PSU curriculum covers all aspects of the fresh produce supply chain from growing and harvesting to storage and preparation through a combination of lecture, laboratory, and field-trip instruction.

The intended audience for PSU has historically been School District Foodservice Staff and State Agency Staff from the Child Nutrition Agency (typically Department of Education) and/or Food

Distribution Agency. Nominations are typically distributed among State and local participants, for each State as follows:

<b>Total Number of Nominees</b>	<b>State Agency Representatives</b>	<b>Child Nutrition Program Operator</b>
4	2	2
4	1	3
4	0	4

In recent years, Federal Nutrition Assistance Programs outside of schools have increasingly adopted Farm to School Initiatives as well as incorporation of new meal pattern standards similar to that of schools in requiring an increased amount of fruit and vegetable consumption. This includes the Child and Adult Care Food Program and Farm to Early Childcare initiatives. Therefore, the intended audience of PSU has grown to include not just School Nutrition Program Operators but all Child Nutrition Program Operators.

Nominations for PSU now typically include Child and Adult Care Food Program Operators, managers, and State Agency consultants. In addition, many States have opted to send their Farm to School program coordinators to PSU. While the audience is still mostly made up of School Nutrition program operators, the content can be broadly applied to all Child Nutrition Program Operators and we anticipate their attendance at PSU to continue to increase.

Purpose

The purpose of the proposed research is to obtain feedback from PSU participants regarding their critical produce safety training needs, course content and delivery, and program impact post-training.

PSU participants including Child Nutrition Professionals, State Agency Staff, and Farm to School Coordinators will be asked to complete three different information collections:

- 1) Welcome Questions (Appendix A) will be administered pre-training.
- 2) Course Evaluation (Appendix B) will be administered post-training.
- 3) 6-month follow-up Program Impact Evaluation (Appendix C) will be administered six months post-training.

Information gathered from these collection activities will be used to highlight critical concerns during the training and influence future training content, resources, and method of delivery. In addition, results will be used to justify program/training funding continuation and potential format changes.

Methodology/Research Design

This research will utilize online surveys to collect information from PSU participants. PSU is offered five times annually with up to 40 participants per session. Participants are nominated by State Agency staff to attend the training. The nomination process typically takes place

during the Fall of each year and nominees are notified of their acceptance by January each year.

Prior to each session, participants will be invited to complete online welcome questions (Appendix A). After the week-long training participants will be invited to complete an online course evaluation (Appendix B). Six months after training is completed, program participants will be invited to complete an online follow-up evaluation (Appendix C). The surveys contain a mixture of qualitative and quantitative question types in a variety of formats.

Completion of all surveys will be 100% voluntary/optional and anonymous unless participants choose to share their information. The survey platform will either be hosted by blackboard through an interagency agreement with USDA's Agriculture Marketing Service (AMS), or through another IT approved platform such as SurveyMonkey or Wufoo.

#### Design/Sampling Procedures

Information collection will only be solicited from PSU program graduates who have completed the entire week of training.

#### Recruitment and Consent

Participants will be notified verbally and in writing that their participation is completely voluntary and they are not required to complete the survey in order to earn continuing education credits.

#### Compensation

Respondents will not receive payment or gifts for their participation.

#### Data Analysis

##### *Qualitative Data*

All feedback received will be entered into an excel spreadsheet for further analysis. Qualitative data will be analyzed for high level themes and considered descriptive and directional. No attempt will be made to generalize findings as nationally representative. Qualitative data will be used to inform future training topic priorities and provide anecdotal evidence of program impact.

##### *Quantitative Data*

Quantitative data received will be entered into an excel spreadsheet for further analysis. Quantitative data will be analyzed to determine specific topic relevance and presenter performance.

#### Outcomes/Findings

Information and formative input gathered from PSU participants through this research will help develop a training course that is relevant, meaningful and financially justified. Research summary findings may be published either electronically or in print for internal agency use, but such documents will not include information that personally identifies any of the research participants.

**(c) Confidentiality:**

The PSU Welcome Questions (Appendix A) and PSU Course Evaluation (Appendix B) are both anonymous surveys that do not require the collection of any personal information. Appendix A collects generic background information related to number of years of experience, what the participant hopes to gain from the training, and the participants biggest concerns. Appendix B asks the participant to rate their overall training experience and the quality of information presented throughout the course.

The PSU 6-month follow-up program impact evaluation (Appendix C) includes a voluntary question on whether the respondent would be willing to share their PSU experience with the public, FNS, or in reports. If they respond yes the participants will be asked to provide their name and work contact information. In the event a participant provides their name, FNS will only utilize their first name and State when reporting any survey associated data. If a participant had a positive experience or made a positive change in their program, FNS may highlight their first name and State when promoting the program to other participants/State Agencies. No individual identification data will be shared in reports or with the public. FNS will not share personal data with any third parties.

**Federal Costs: \$2,090.80**

The cost of an FNS employee, General health series, assigned as program manager is estimated to require 40 hours of work on this research collection each year. Based on a GS-13 Step 4 hourly rate of \$52.27 from the Washington, D.C., Maryland, and Virginia General Schedule for 2019, the initial annual cost of this effort is \$2,090.80. Adding \$689.96 to account for fully-loaded wages ( $\$2,090.80 \times .33$ ), the estimated annual cost of this effort is \$2,780.76.

**(d) Research Tools/Instruments:**

- **Appendix A:** PSU Welcome Questions
- **Appendix B:** PSU Course Evaluation
- **Appendix C:** PSU 6-month follow-up Program Impact Evaluation