

SUMMARY OF CLEARANCE
U.S DEPARTMENT OF AGRICULTURE, FOOD AND NUTRITION SERVICE
SCHOOL LUNCH/BREAKFAST/SNACK CLAIM FOR REIMBURSEMENT FNS 806-A
And MILK CLAIM FOR REIMBURSEMENT FNS 806-B
OMB CLEARANCE NUMBER 0584-0284

The FNS 806-A and 806-B are used to collect data from school food authorities who participate in the NSLP, SBP and SMP that are directly administered by the FNS regional offices. The data is used to determine the amount of reimbursement for meals and milk served.

**SUPPORTING STATEMENT
FOR
FORMS FNS 806-A and FNS 806-B**

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Section 3(a)(10) of the Child Nutrition Act of 1966, as amended, requires that State educational agencies disburse funds paid to the State during any fiscal year for purposes of carrying out the provisions of the Special Milk Program (SMP) in accordance with agreements approved by the Secretary. Section 3 further limits the SMP to nonprofit schools, nonprofit nursery schools, child care centers, settlement houses, summer camps, and similar nonprofit institutions which do not participate in a meal service program authorized under the Child Nutrition Act or the National School Lunch Act.

Section 4 of the Child Nutrition Act, as amended, authorizes payments to the States to assist them to initiate, maintain, or expand nonprofit breakfast programs in schools, namely the School Breakfast Program (SBP). Section 3 of the Richard B. Russell National School Lunch Act (NSLA), as amended, authorizes funds for States to operate the National School Lunch Program (NSLP). School food authorities must submit meal data for the NSLP and SBP monthly to the State agency in order to receive reimbursement. School food authorities must submit the number of half-pints of milk served and cost data for the SMP monthly to the State agency in order to receive reimbursement. In those instances where the FNS regional office administers the programs (ROAP), school food authorities administering the programs submit the data to the regional office for processing to receive reimbursement.

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

FNS administers the NSLP, SBP and SMP in school food authorities in Virginia, Georgia, Colorado and Missouri. ROAP school food authorities submit data on the number of meals served under the NSLP and SBP on the Monthly Claim for Reimbursement (FNS 806-A) to determine the amount of reimbursement they are entitled to receive. Milk and cost data for the SMP are submitted on the Monthly Claim for Reimbursement (FNS 806-B). The data is submitted to the FNS regional office where it is entered into a computerized payment system. The payment system computes the amount of reimbursement. Earned reimbursement in the NSLP, SBP and SMP is based on performance which is measured as an assigned rate per meal or half pint of milk served, with cost comparisons for free milk served, and severe need breakfasts. To fulfill the earned reimbursement requirements set forth in NSLP, SBP and SMP regulations, the meal and cost data must be collected on the FNS 806-A and FNS 806-B. These forms are an intrinsic part of the accounting system being used currently by the subject programs to ensure proper reimbursement.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The Food and Nutrition Service is complying with the E-Government Act. FNS has implemented an Internet component for this ROAP payment system. The Internet component allows a school food authority to submit application and claim information to FNS via a secure Internet connection. The Internet component of the system allows all tasks from the beginning of application entry/renewal to claims submission and payment to be paperless. A paper-based system is available for school food authorities that do not have access to the Internet.

The ROAP payment system processes applications, claims, and payments and adjustments for ROAP school food authorities. The system operates with edit checks to automatically enforce Federal rules and regulations governing participation and reimbursements in the Child Nutrition Programs.

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

The Child Nutrition Program is the only program collecting this data; therefore, no collection duplication exists. Each school food authority operating the programs is required to report information on its program results in order for the administering agency to reimburse the school food authority. No State or local organization collects this same information for other Federal agencies, as the programs are administered at the Federal level solely by FNS.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

There is no impact on small businesses.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Approximately, 273 school food authorities currently participate in the ROAP annually. The number of meals served must be collected monthly on a continual basis because these quantities differ from month to month and year to year. This is due to constant fluctuation in enrollment and program participation. If the information was collected less frequently, program participants would not receive the monthly reimbursement they actually earned and the Agency would lose some program accountability.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.6.

The NSLA requires that states reimburse school food authorities on a monthly basis. Therefore, regional offices that administer the programs must also reimburse school food authorities on a monthly basis. Hence school food authorities are required to submit data on the number of meals and milk served on a monthly basis to receive their reimbursement.

8. 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.

As required by 5 CFR 1320.8(d), the Federal Register Notice was published in volume number 71 on Wednesday, July 19, 2006 at page 40988. (Copy attached) The comment period ended on September 18, 2006, and no comments were received in response to this notice.

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.

Whenever FNS publishes a notice of proposed action, copies are posted on the Agency's website for review and comment by the regional offices, State Directors, local school food authorities, program partners, etc.

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

No payment or gift was provided to respondents.

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

No confidential information is associated with the burden related to the reporting of meals and milk claimed for reimbursement.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature included in this clearance package.

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

The number of school food authorities that operate the programs under the administration of the regional office is 273. There are 207 operating the NSLP and SBP that report meals served on the FNS 806-A. An additional 66 school food authorities operate the SMP and report the number of milks served and cost data on the FNS 806-B. The school food authorities submit meal and milk participation data 10 times per year with an estimated time of .5 hours per response. The estimated time required to complete these forms was derived by identifying the task to be performed, the frequency with which a “typical” school food authority performs the task, and the estimated time needed to perform the task based on information provided by staff that perform the task.

Reporting Burden.....1,678
 Recordkeeping Burden..... 218
 TOTAL BURDEN.....1,896

12.(b) Provide separate hour burden estimate for each form and aggregate the hour burdens in item 13 of OMB Form 83-1.

REPORTING
 FNS - 806A

Format	No. Respondents	No. Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Burden
Paper	83	10	830	.75	662.5
Electronic	124	10	1,240	.50	620
TOTAL	207	10	2,070		1,282.5

FNS 806B

Format	No. Respondents	No. Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Burden
Paper	26	10	260	.75	195
Electronic	40	10	400	.50	200
TOTAL	66	10	660		395

SUMMARY REPORTING BURDEN

No. Respondents	No. Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Burden
273	10	2,730	.61	1,677.5

RECORDKEEPING

No. Recordkeepers	No. Records Per Recordkeeper	Total Annual Records	Hours Per Record	Total Burden
273	10	2,730	.08	218.40

BURDEN SUMMARY

No. of Respondents	No. Responses Per Respondent	Total Annual Responses	Hours Per Response	Total Annual Burden
273	10	2,730	.69	1,896

12.(c) Provide estimate of annualized cost to respondents for the hour burden of the collection of information.

To estimate public cost, we consulted the 1998 National Compensation Survey, U.S. Department of Labor. The average hourly rate of local government employees, along with private sector employees is \$17.61. Given this we made the following computations:

$$1,896 \text{ (Burden Hours)} \times \$17.61 \text{ (Per Hour)} = \$33,388.56 \text{ (Cost to Respondents)}$$

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no start-up or annual maintenance costs for the collection of information..

14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would not have been incurred without this collection of information.

FEDERAL COST

We identified functions performed by FNS staff related to the ROAP payment system for the child nutrition programs and obtained estimates of the number of staff hours spent performing these functions. FNS staff maintains the payment system in the Mid-Atlantic Regional Office and processes the claims for reimbursement. Estimated costs are provided in Table A14.1.

Table A14.1 – Estimated Annualized Cost to the Federal Government

Activity	Hours	Cost Estimate (hourly rate)
Form revision	8 hours	\$208.74 (\$26.09)
Receipt, input and processing data	683 hours (.25 hr X 273 respondents X 10 times)	\$17,806 (\$26.09)
Run and Disposition of claims (batch run)	10 (1 hr per run X 10 times)	\$260.90 (\$26.09)
Total Cost		\$18,275.64

Hourly rate for GS-11/Step 1 staff

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

The total burden requested for this collection is 1,896. This is an increase of 161 hours from the previously approved inventory of 1,735. The time needed to complete the electronic form has decreased from .75 of an hour per response to .50 of an hour (60% of the responses); the number

of respondents has increased from 209 to 273 due to the increase in the number of school food authorities participating in the programs administered by the regional offices. With the increase in the number of respondents, thus recordkeeping burden previously identified as 167 hours increases to 218 hours. Therefore, the increase of 161 hours to the previously approved 1,735 hours, to the requested burden for this collection of 1,896, is due to an adjustment.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

There are no plans to publish a compilation of the results from this information collection.

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

We are seeking approval not to display the expiration date for OMB approval on the forms included in this clearance. To display the expiration data would require revising the electronic system and destroying copies of current inventory even when there are no changes in the data elements of the forms.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions to the certification statement.