



TO: OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Ruth Brown
Office of Chief Information Officer
United States Department of Agriculture (USDA)

FROM: Eric Steiner
Associate Administrator
Special Nutrition Programs

SUBJECT: Justification for a Change in Burden Hours ICR #0584-0293
Management of Donated Foods in Child Nutrition Programs, the Nutrition Services Incentive Program, and Charitable Institutions

Through this memorandum, we are requesting a change in burden hours for an Information Collection Request (ICR), OMB Control No. 0584-0293, which was approved on August 8, 2006. This ICR reflected a change in burden hours as a result of the proposed rule, *Management of Donated Foods in Child Nutrition Programs, the Nutrition Services Incentive Program, and Charitable Institutions*, which was published on June 8, 2006. The final rule, which contained non-substantive changes to the burden as approved, was published on August 8, 2008. A justification for these non-substantive changes, which resulted in a decrease to the total number of burden hours required, is provided below.

As described in the final rule, the total estimated annual burden for OMB No.0584-0293 should reflect a decrease to 1,070,452 hours rather than the decrease to 1,085,814 hours included in the currently approved ICR. The discrepancy is a result of two things: mathematical errors in calculating burden hours and information obtained after publication of the proposed rule. This information includes a survey of school food authorities (SFAs) conducted in school year 2003-04, which estimated that 13.4 percent of SFAs had contracts with Food Service Management Companies. Hence, for school year 2005-06, it is estimated that 2,783 of the 20,770 SFAs participating in the National School Lunch Program had such contracts, rather than the 1,765 included in the proposed rule. This adjustment results in an increase of 1,272 burden hours for this particular activity. However, because of mathematical errors in calculating the burden in the currently approved ICR, we estimate a reduction in the total annual burden for OMB No. 0584-0293 to 1,071,724 hours.

The resulting changes in the reporting and recordkeeping burdens associated with food service management contracts, from both current levels, and those included in the proposed rule, are shown in the following table.

Section		No. of Respondents	No. Responses Per Respondent	Total Annual responses	Hours Per Response	Total Hours
Reporting						
250.12(d)	Current	300	0.25	75	0.33	24.75
250.54	Proposed	1,765	1	1,765	1	1,765
250.53	Final	2,783	1	2,783	1	2,783
Recordkeeping						
250.12(d)	Current	300	---	---	0.08	24
250.54/250.55	Proposed	1,765	---	---	0.25	442
250.53/250.54	Final	2,783	---	---	0.25	696

Estimated total number of respondents: 18,552

Estimated total annual responses: 1,160,746

Estimated annual burden: 1,071,724

FNS is requesting an adjustment in the total annual burden associated with OMB No. 0584-0293 to reflect the changes indicated above. When these information collection requirements have been approved, FNS will publish separate action in the Federal Register announcing OMB's approval.

If you have any questions regarding this request, please contact Michelle Waters or Theresa Geldard or of the Food and Nutrition Service, Food Distribution Division at (703) 305-2662.

Attachments