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Agriculture

Food and  
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Service

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FROM: Cathie McCullough *L. Castro for*  
Director  
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SUBJECT: Justification for a Change in Burden Hours - OMB# 0584-0293  
Food Distribution Forms

This justification requests an increase in burden hours for the Food Distribution Forms collection due to additional reporting requirements resulting from the American Recovery and Reinvestment Act (ARRA) of 2009 (Public Law 111-5).

ARRA provided increased administrative funding for State agencies that administer the Emergency Food Assistance Program (TEFAP). These agencies use Form FNS-667, approved under OMB# 0584-0293, to report on their use of such administrative funding. ARRA funds must be tracked separately from TEFAP administrative funds provided through the normal appropriations process. Food and Nutrition Service (FNS) intends to ask these agencies to complete two FNS-667s each quarter, one covering the ARRA funds, and one for their regular State administrative funding. Each agency will also complete a close-out FNS-667 each fiscal year.

This additional reporting will require no change to the form, to the approved data elements it includes, or to the number of respondents; the change in burden is limited to the need to provide two responses each quarter, doubling the number of responses for each respondent. We anticipate an increase of 1,540 hours as a result of these increased responses. Each of the 55 respondents will spend 3.5 hours per response and will be required to submit eight responses over one and a half fiscal years (the total duration of ARRA funding). A copy of the data collection instrument, FNS-667, is attached.

Section 101 of ARRA provides \$5 million to Food Distribution Programs on Indian Reservations (FDPIR) for equipment upgrades and facility repair. For ARRA reporting, States and Indian Tribal Organizations (ITO) that received funds specifically for equipment purchase will report the use of these funds on the SF-425 and will be required to provide six responses over one and a half fiscal years. It is estimated that

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each response will take about 45 minutes to complete and that 97 ITOs will be required to respond. We anticipate an increase of 437 hours as a result of this additional reporting. A copy of the data collection instrument, SF-425, is attached.

In aggregate, this will increase the total annual number of burden hours for this collection from 1,071,024 to 1,073,001.

Attachments