

SUMMER FOOD SERVICE PROGRAM
OMB CLEARANCE NUMBER 0584-0280

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1. Circumstances making the collection of information necessary.

This is a revision of a currently approved information collection. Section 13 of the National School Lunch Act (NSLA), as amended, authorizes the Summer Food Service Program for Children (SFSP). The SFSP is directed toward children in low-income areas when school is not in session. It is locally operated by approved sponsors, which may include public or private non-profit school food authorities (SFAs), public or private non-profit residential summer camps, or units of local, municipal, county or State governments or other private non-profit organizations that develop a special summer or other school vacation program providing food service similar to that available to children during the school year under the National School Lunch Program (NSLP), OMB Number 0584-0006 which expires on May 31, 2012 and the School Breakfast Program (SBP) OMB Number 0584-0012 which expires on May 31, 2012.

2. Purpose and use of the information.

This information is required to administer and operate this program in accordance with the NSLA. State agencies enter into agreements with organizations for local level program operation and delivery of program benefits and services to eligible children. Program operators must submit monthly claims for reimbursement using FNS- 418 to its administering agency to receive reimbursement; all meals claimed for reimbursement must meet Federal requirements and be served to eligible children. While all SFSP meals are served at no charge, the sponsors of certain types of feeding sites must make individual determinations of eligibility for free or

reduced price meals.

3. Use of information technology, and reduce burden.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. To the extent possible, agencies within the States use electronics to transfer information for sponsors, camps, other sites, and households where applicable. However, since SFSP participants vary considerably in the level of sophistication, the use of improved technology to reduce the burden is limited.

Each state agency maintains its own website to communicate electronically with sponsors, camps, other sites, and households in their state. In the fourth quarter of FY 2009, approximately 88.7 percent of the total respondents in this submission reported the FNS- 418 electronically to FPRS, at www.fprs.fns.usda.gov.

4. Efforts to identify duplication and use of similar information.

There is no similar information data collection available. This SFSP is administered solely by FNS.

5. Impact on small businesses or other small entities.

Some local agencies and institutions undoubtedly meet the definition of “small organizations.” Information being requested or required has been held to the minimum required for the intended use. Although smaller State Agencies, Camps and Sponsors involved in this data collection effort, they delivered the same program benefits and perform the same function as larger ones. Thus, they maintain the same kinds of information on file. FNS estimates that 50% of sponsors or 1,921

sponsors and 100% of camps are considered small entities, approximately 766 respondents for a total of 2,687 small entities.

6. Consequence of collecting the information less frequently.

The SFSP has a short operating period and State agencies and sponsors would lose operating funds if claims for reimbursement are not submitted in a timely manner. In order to receive reimbursement for eligible meals served, sponsors must submit a claim for reimbursement within 60 days of the last day of operation and State agencies have 90 days to submit final claims from the last day of operation.

7. Special circumstances relating to guidelines in 5 CFR 1320.5.

This collection requires respondents to report information to the agency more often than quarterly. Sponsors must submit a claim for reimbursement within 60 days of the last day of operation and State agencies have 90 days to submit final claims from the last day of operation.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. Comments in response to the Federal Register Notice and efforts to consult outside agency.

A notice was published in the Federal Register at 74 FR 36649 on July 24, 2009. No comments were received.

FNS consults with Regional Offices regarding any proposed changes as the result of legislative,

regulatory or administrative changes. Regional offices are in daily contact with State agencies which provide feedback on FNS processes and procedures for this information collection.

9. Explanation of any payment or gift to respondents.

No payment or gift was provided to respondents.

10. Assurance of confidentiality provided to respondents.

The Department will comply with the Privacy Act of 1974.

11. Justification for sensitive questions.

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

12. Provide estimates of the hour burden including annualized hourly cost.

There are 105,249 respondents which include: State agencies, Business: Profit and Not-for-profit, Individuals and Households. One hundred five thousand two hundred forty nine program participants operate the SFSP at the state and local level.

52 SAs

3,842 Sponsors

766 Camps and Sites

100,589 Individuals & Households

105,249 Total Respondents

A.12.1 REPORTING & RECORDKEEPING– The current burden inventory is 257,363 for both reporting and recordkeeping. This submission retains the number of burden hours 182,683 and decreases the number of recordkeeping burden hours from 74,680 to zero because FNS does not

require respondents to keep records longer than three years.

Total Reporting Hours	182,683
Total Part 225 Burden Hours	182,683

A.12.3 Annualized Cost to Respondent

To estimate public cost, we consulted the U.S. Department of Labor’s 2007 Bureau of Labor Statistics. The average hourly rate of all State employees is \$29.02. During the most recent fiscal year for which we have data on SA Expenditure of both SAF and State appropriated funds, SAs funded 15 percent from State sources. Therefore, we computed SA compliance cost at a rate of \$4.35 per hour rather than \$29.02. The average hourly rate of local government employees, along with private sector employees, is \$17.69. FNS used the minimum wage rate for Individual/Households of \$7.25. Given this, we made the following computations.

Reporting

SA Level	46,709 hours x \$4.35	\$203,184
Sponsor Level	60,340 hours x \$17.69	\$1,067,414
Camps & Other Sites	192 hours x \$17.69	\$3,396
<u>Individuals & Households</u>	<u>75,442 hours x \$7.25</u>	<u>\$546,954</u>
TOTAL	<u>182,683 hours</u>	<u>\$1,820,948</u>

13. Estimate of other total annual cost burden to respondents or record keepers.

There is no start-up or annual maintenance costs for this collection of information.

14. Annualized cost to the Federal government.

Federal Cost

The Federal cost of collecting and processing data under Part 225, issuing Program regulations, guidance, and monitoring compliance with the regulations is presented below. FNS used the following procedure to estimate this cost:

- (i) FNS identified functions performed by FNSRO and Headquarters staff that benefits the SFSP and obtained estimates of the total number of staff hours spent performing these functions. For Headquarters and FNSRO, staff obtained estimates from personnel who perform the functions.

FEDERAL COSTS OF SFSP - PERSONNEL				
(1)	(2)	(3)	(4)	(5)
FUNCTION	DONE BY	TOTAL STAFF HOURS	SFSP ALLOCATION PERCENTAGE	PORTION TO SFSP (3X4)
Professional Assistance to State agencies	FNS Regional Office	22,880 hours	20%	4,576 hours
Drafting/Clearing Regulations	HQ	14,560 hours	40%	5,824 hours
Policy Development Guidance	HQ	14,560 hours	40%	5,824 hours
TOTAL				16,224

Using the 2009 Federal Wage Salary Tables, we estimated the salary rate is \$29.00 per hour (the average hourly salary for a GS 11/12 which is the grade level of staff who performs these functions). Our computations are:

FEDERAL

SALARIES

Salaries (16,224 hours @ \$29.00)	\$470,496.00
10 % for Administrative overhead	<u>\$47,049.60</u>
Federal Cost	<u>\$517,545.60</u>

15. Explanation of program changes or adjustments.

This is a revision of a currently approved information collection. The program change is due to a decrease of 74,680 burden hours due to the elimination of the recordkeeping burden for 7 CFR Part 225 which does not require program participants to maintain records for more than three years; respondents maintain records during their routine business practices.

16. Plans for tabulation and publication and project time schedule.

This submission does not involve the collection of information by statistical methods.

17. Reasons that display of OMB expiration date is inappropriate.

We are not seeking approval concerning the display of the expiration date.

18. Exception to certification for Paperwork Reduction Act submissions.

There are no exceptions to the certification statement.