

FORMS-806-A, Claim for Reimbursement (National School Lunch and School Breakfast Programs), and FNS-806-B, Claim for Reimbursement (Special Milk Program for Children)

OMB CLEARANCE NUMBER 0584-0284

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1. Circumstances making the collection of information necessary.

This is a revision of a currently approved information collection. The information on the forms FNS 806A and FNS 806B must be collected from school food authorities (SFAs) whose participation in the National School Lunch (NSLP), OMB# 0584-0006, School Breakfast (SBP), OMB# 0584-0012 and School Milk Programs (SMP), OMB# 0584-0005 each expires 05/31/2012 are administered directly by the Food and Nutrition Service (FNS) Regional Offices (Regional Office Administered Programs, or ROAP). In order to determine the amount of reimbursement for meals and milk served, the SFAs are required to complete these forms.

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. Purpose and use of the information.

FNS administers the NSLP, SBP and SMP in school food authorities in Colorado, Georgia and Virginia. 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. Use of information technology and reduce burden.

The Food and Nutrition Service is complying with the E-Government Act of 2002. 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. Efforts to identify duplication and use of similar information.

There is no similar information data collection available. The ROAP reimbursement process is administered solely by FNS.

5. Impact on small businesses or other small entities.

Some SFAs 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 SFAs involved in this data collection effort, they deliver 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 100% of SFAs are considered small entities, approximately 233 respondents.

6. Consequence of collecting the information less frequently.

Approximately 233 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. Special circumstances relating to guidelines in 5 CFR 1320.5.

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.

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 on September 24, 2009, Volume 74, No. 184 on pages 48710 and 48711. No comments were received.

FNS consults with Regional Offices regarding any proposed changes as the result of legislative, regulatory or administrative changes. In the ROAP case, the regional office is able to contact SFAs on a daily basis if necessary. SFAs are able to 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.

The number of school food authorities that operate the programs under the administration of the regional office is 233. There are 233 operating the NSLP, SBP and SMP that report meals served on the FNS 806-A and milk served on the FNS 806-B. The SFAs submit meal and milk participation data 12 times per year with an estimated time of .5 hours per response.

Total Reporting Burden:

FNS-806A

882

Total hours 1,398

Affected Public	(b) Form Number	(c) No. of Respondents	(d) No. Responses per Respondent	(e) Est. Total Annual Responses (cxd)	(f) Hours per Response	(g) Total Burden (exf)
School Food Authority	FNS 806A	147	12	1764	.5	882
School Food Authority	FNS 806B	86	12	1032	.5	516
Total Annual Burden Estimates		233	12	2,796	.5	1,398

PUBLIC COST

To estimate public cost, we consulted the 2008 Department of Labor National Occupational Employment and Wage Estimates. We computed SFA personnel cost at a rate of \$14.81 per hours.

Given this information, we made the following computations:

Reporting

SFA food service worker 1,398 hours X \$14.81 \$20,704

TOTAL **1,398 hours** **\$20,704**

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

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

14. Annualized cost to the Federal government.

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)
Drafting/Reviewing Data Collection	160 hours x \$45.51	\$7,281.60
Receipt, input and processing data	233 respondents x 12 times x 0.25 hr = 699 hours	\$22,319
Run and Disposition of claims (batch run)	1 hr per run x 12 times = 12 hours	\$383.16
Total Cost		\$29,983.76

FNS HQ Staff: Using the Federal Salary Table 2010 hourly rate of \$45.51 for a GS-13/Step 3
 ROAP Staff: Using the Federal Salary Table 2010 hourly rate of \$31.93 for a GS-11/Step 3

15. Explanation of program changes or adjustments.

This is a revision of a currently approved collection. The state of Missouri no longer participates as a ROAP, therefore, the number of respondents has been reduced from 273 to 233 and the recordkeeping burden has been eliminated because SFAs are not required to maintain their records for more than three years which falls within their routine business practices. Therefore, the total burden has decreased from 1,896 burden hours to 1,398 burden hours.

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.