**United States**

**Department of**

**Agriculture**

Food and

Nutrition

Service

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TO: OMB Desk Officer

 Office of Information and Regulatory Affairs

 Office of Management and Budget

THROUGH: Rachelle Ragland-Greene

 Food and Nutrition Service (FNS) Clearance Office

 Food and Nutrition Service

FROM: Melissa Rothstein

 Acting Director

 Child Nutrition Division

SUBJECT: Justification for a Change to ICR #0584-0055, 7 CFR Part 226,

Child and Adult Care Food Program

Through this memorandum, we are requesting an increase of 90 burden hours (from 7,032,870 to 7,032,960) for the Child and Adult Care Food Program, OMB Control No. 0584-0055, which was approved on August 4, 2010. The increase would support additional data collection required to comply with the Improper Payments Information Act of 2002 (Public Law 107-300). As part of this effort, the Food and Nutrition Service (FNS) prepares an annual national estimate of the share of CACFP-participating family day care homes that are approved for an incorrect level of per meal reimbursement, or reimbursement "tier," for their circumstances. Tiering errors result in improper payments because misclassified family day care homes do not receive the appropriate level of reimbursement for the meals and snacks provided to the children. The assessment also estimates the dollar amount of improper payments attributable to family day care home tiering errors.

While most of the data for the assessment is drawn from previously-collected administrative records and publicly-available Census Group Block eligibility data, in a small number of cases in which accuracy cannot be verified through these data, additional documentation must be requested from family day care home sponsors. FNS authority to collect such data is found in 7 CFR Section 226.6(n) *Program irregularities*, which states that “FNS and OIG may make investigations at the request of the State agency, or whenever FNS or OIG determines that investigations are appropriate.”

We anticipate an increase of 90 hours per year for the additional reporting (See chart below).

**BURDEN MATRIX FOR STATES AND SPONSORS FOR THE 2008-2009 AND THE 2009-2010**

**CACFP TIERING ASSESSMENT PROJECT**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  **States** |  |  **Sponsors** |  |  **FDCHs** |  |  **Burden on States and Sponsors** |  |
|  | **2008-2009** | **2009-2010** | **2008-2009** | **2009-2010** | **2008-2009** | **2009-2010** | **Total****Minutes (Estimated)****2008-2009** | **Average Minutes Across 2 Waves** **2009-2010)** |
| **Sample**  | 14 | 14 |  |  |  |  | 280(20 min. per State) | 280(20 min. per State) |
| **Data Collected** |  |  |  |  |  |  |  |  |
| Recruitment  |  |  | 63 | 61 |  |  | 630(10 min. per sponsor) | 610(10 min. per sponsor) |
| MOU's, Lists of FDCHs |  |  | 60 | 60 |  |  | 4808 min. per sponsor | 4808 min. per sponsor |
| Meal Counts, Tiering Dates for Sampled FDCHs |  |  | 60 | 60 | 660 | 660 | 1,980(3 min. per FDCH) | 1,980(3 min. per FDCH) |
| FDCHs Replaced Due to Zero Meal Counts |  |  |  |  | 29 | 48 | 435(15 min. per FDCH) | 720(15 min. per FDCH) |
| Follow-up Tiering Assessment Data Requested |  |  | 52 | 54 | 222 | 242 | 1,110(5 min. per FDCH) | 1,210(5 min. per FDCH) |
| **Total Minutes** |  |  |  |  |  |  | **4,915** | **5,280** |
| **Total Hours** |  |  |  |  |  |  | **81.91667** | **88.0** |