



United States
Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive

Alexandria, VA 22302-1500

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			480 8 min. per sponsor	480 8 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