

**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

**Yolly Smith, Program Analyst
Food and Nutrition Service, USDA
Child Nutrition Division
Program Analysis and Monitoring Branch
Special Nutrition Program
3101 Park Center Drive
Alexandria, VA 22302
PH: 703-305-2664
Yolly.Smith@fns.usda.gov**

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This is a revision of a currently approved information collection. The information on the forms FNS -806-A and FNS-806-B (expires 02/29/2016) must be collected from school food authorities (SFAs) who participate in the National School Lunch Program (NSLP), School Breakfast Program (SBP) and School Milk Programs (SMP). These forms 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 to 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. To fulfill the reimbursement requirements set forth in NSLP, SBP and SMP regulations issued by the Secretary of Agriculture (7 CFR 210.8, 215.10 and 220.11), the meal and milk data must be collected on Forms FNS-806A and FNS-806-B, respectively.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to 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. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

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

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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 210 respondents.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Approximately 210 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. Circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5:**

- **requiring respondents to report information to the agency more often than quarterly;**

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.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

A notice was published in the Federal Register on December 19, 2012, Volume 77, No. 244 on pages 75112 -75117. No comments were received.

- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.**

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. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Department complies with the Privacy Act of 1974. No confidential information is associated with this information.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

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

- 12. Provide estimates of the hour burden of the collection of information. The statement should include:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burned estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

The number of school food authorities that operate the programs under the administration of the regional office is 210. There are 210 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.

ESTIMATED ANNUAL REPORTING BURDEN FOR OMB CONTROL #0584-0284 MONTHLY CLAIM FOR REIMBURSEMENT

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 806-A	133	12	1596	.5	798
School Food Authority	FNS 806-B	77	12	924	.5	462
Total Annual Burden Estimates		210	12	2,520	.5	1,260

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

To estimate public cost, we consulted the 2011 Department of Labor National Occupational Employment and Wage Estimates (http://www.bls.gov/oes/current/oes_nat.htm#35-0000).

We computed SFA personnel cost at a rate of \$10.94 per hours. Given this information, we made the following computations:

Reporting

SFA food service worker	1,260 hours X \$10.94	\$13,784
TOTAL	1,260 hours	\$13,784

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

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

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

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

Staff	Activity	Hours	Cost Estimate (hourly rate)
FNS-HQ: GS-13/Step 3	Drafting/Reviewing Data Collection	160 hours x \$45.51	\$7,281.60
ROAP: GS-11/Step 3	Receipt, input and processing data	210 respondents x 12 times x 0.25 hr = 630 hours x \$31.93	\$20,115.90
ROAP: GS-11/Step 3	Run and Disposition of claims (batch run)	1 hr per run x 12 times = 12 hours x \$31.93	\$383.16
	Total Cost		\$27,780.66

FNS HQ Staff: Using the Federal Salary Table 2012 hourly rate of \$45.51 for a GS-13/Step 3

ROAP Staff: Using the Federal Salary Table 2012 hourly rate of \$31.93 for a GS-11/Step 3

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

This is a revision of a currently approved collection. The burden hours have decreased from the previously approved burden (1,398) due to a reduction in the number of respondents. School Food Authorities have decreased from 233 to 210. Therefore, the total burden has decreased from 1,398 burden hours to 1,260 burden hours.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18. Explain each exception to the certification statement identified in Item 19

"Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.