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United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

TO: Julie Wise, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Ruth Brown, Desk Officer
United States Department of Agriculture
Office of Chief Information Office

FROM: Lynnette Williams
Branch Chief, Planning & Regulatory Affairs
Food and Nutrition Service

SUBJECT: Justification for Non-Substantive Revision to OMB Control No: 0584-0562, Special Nutrition Program Operations Study

Through this memorandum, we are requesting a non-substantive change to the burden estimates for Special Nutrition Program Operations Study, under the Information Collection Request (ICR), OMB Control No. 0584-0562, which was approved on April 19, 2013.

The objective of this study is to collect timely data on policies, administrative, and operational issues on the Child Nutrition Programs. The policy and operational issues include, but are not limited to, the preparation of the program budget, development and implementation of program policy and regulations, and identification of areas for technical assistance and training.

The Child Nutrition Program would like to add four additional questions to the Year 2 School Nutrition Program Operations Study School Food Authority (SFA) Director Survey in order to capture relevant information needed to address potential legislation that would give SFAs in good financial standing an exemption to the paid meal equity requirements established in the Healthy Hunger-Free Kids Act of 2010. The SFA Directory survey currently includes a number of questions related to the paid meal equity requirement in Section 6: Meal Prices. These additional questions would be added to the end of Section 6.

The additional questions are:

6.19 How would you characterize the financial standing of your non-profit school food service account before the implementation of the paid lunch equity requirement?

- a. Our account generally broke even
- b. Our account generally had a one-month or two-month operating balance
- c. Our account was nearing the 3-month operating balance limit
- d. Our account balance was over the 3-month operating balance limit
- e. Our account had a negative balance

AN EQUAL OPPORTUNITY EMPLOYER

6.20 How would you characterize the financial standing of your non-profit school food service account since the implementation of the paid lunch equity requirement?

- a. Our account generally breaks even
- b. Our account generally has a one-month or two-month operating balance
- c. Our account is nearing the 3-month operating balance limit
- d. Our account balance is over the 3-month operating balance limit
- e. Our account currently has a negative balance

6.21 If your non-profit school food service was previously operating with a negative balance, has the paid lunch equity requirement helped to bring the account into the black?

- a. Yes, we no longer operate with a negative balance
- b. No, we still have a negative account balance
- c. We were not previously operating with a negative balance

6.22 Are you concerned that the revenue gained from the paid lunch equity requirement will take you over the 3-month operating balance limit?

- a. Yes
- b. No

The 4 additional questions will not increase the 3 hour burden currently approved for the SFA Director Survey. The currently approved burden hours are:

	Estimated # Respondents	Responses Per Respondent	Total Annual Responses (Col. BxC)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. Dx E)
Total Reporting Burden	1,938	4.9355	9,565	.5326	5,094
TOTAL BURDEN FOR #0584-0562	1,938	4.9355	9,565	.5326	5,094

If you have any questions regarding this request, please contact Lynnette Williams, Branch Chief for the Food and Nutrition Service, Planning & Regulatory Affairs Branch at (703) 605-4782.