

## Recordkeeping

Program Rule	CFR Citation	Title	Form Number	A	B	C = (A*B)	D	E = (C*D)	F	Due to Authorizing Statute
				Estimated # Record-keepers	Records Per Recordkeeper	Total Annual Records	Estimated Avg. # of Hours Per Record	Estimated Total Hours	Current OMB Approved Burden Hrs	
<b>State Agency Level</b>										
Direct Certification	245.6(b)(1)(iv)	SA must maintain agreements with the SA conducting eligibility determinations for SNAP.		54	1	54	0.10	5	5	
Community eligibility	245.9(f)(4)(ii)	State Agency to review and confirm LEAs eligibility to participate in provision		56	9	500	0.08	40	0	
F/R Eligibility	245.11 (h)	SAs maintain requested data on number of schools on Provisions 1, 2, or 3and extensions granted.		43	155	6,665	0.25	1,666	1,666	
F/R Eligibility	245.11 (i)	SAs maintain annual verification data collected from SFAs.	742	56	1	56	0.20	11	11	
CIP	245.12 (e) and (g)	State agencies that fail to meet the direct certification benchmark must maintain a Continuous Improvement Plan.		18	1	18	0.50	9	9	
<b>State Agency Level Total</b>				56	130.23	7,293	0.24	1,731	1,691	0
<b>Local Education Agency (LEA) &amp; School Food Authority (SFA) Level</b>										
F/R Eligibility	245.6 (e)	SFAs must maintain documentation substantiating eligibility determinations for 3 years after the end of the fiscal year.		20,858	1	20,858	0.08	1,669	1,669	
F/R Eligibility	245.9 (g)&(h)	SFAs must retain records of schools implementing Provision 1, 2 or 3 for 3 years after submission of the last Claim for Reimbursement.		1,092	1	1,092	2.4715	2,699	2,699	
Community eligibility	245.9(h)(3)	LEA to maintain documentation related to methodology used to calculate the identified student percentage and determine eligibility		500	1	500	0.08	40	0	
<b>School Food Authority Level Total</b>				20,858	1.08	22,450	0.20	4,408	4,368	0
<b>School Level</b>										
						-		-		
						-		-		
<b>School Level Total</b>				-	-	-	-	-	-	-
<b>Total Recordkeeping Burden</b>				20,914	1.42	29,743	0.21	6,139	6,059	0

Program Rule	Estimated # Record-keepers	Records Per Recordkeeper	Total Annual Records	Estimated Avg. # of Hours Per Record	Estimated Total Hours	Current OMB Approved Burden Hrs	Due to Authorizing Statute
F/R Eligibility	20,914	1.37	28,671	0.21	6,045	6,045	0
Direct Certificat	54.0	1.00	54.0	0.10	5.3	5.3	-
CIP	18.0	1.00	18.0	0.50	9.0	9.0	-
Community eligibility	556.0	1.80	1,000.0	0.08	80.0	-	-
0	-	0.00	-	0.00	-	-	-

G-E-F		
Due to Program Change	Due to an Adjustment	Total Difference
		0
40		40
		0
		0
		0
40	0	40
	-	-
	-	-
40		40
40	0	40
		-
		-
-	-	-
80	0	80

Due to Program Change	Due to an Adjustment	Total Difference
0	0	0
0.0	-	-
0.0	-	-
0.0	-	80.0
-	-	-

OMB Control #0584-0026  
7 CFR Part 245, Determining Eligibility for Free Reduced Price Meals

Reporting													
Program Rule	CFR Citation	Title	Form Number	A Estimated # Respondents	B Responses per Respondents	C = (A*B) Total Annual Records	D Estimated Avg. # of Hours Per Response	E = (C*D) Estimated Total Hours	F Current OMB Approved Burden Hrs	Due to Authorizing Statute	Due to Program Change	Due to an Adjustment	G = E-F Total Difference
<b>State Agency Level</b>													
F/R Eligibility	245.4 (c)	Puerto Rico and Virgin Islands SAs conduct triennial survey to develop factor for withdrawal of funds from Letter of Credit.		2	0.33	0.66	70.00	46.20	46.20				0
F/R Eligibility	245.4 (d)	Puerto Rico and Virgin Islands SAs submit survey results and the factor for fund withdrawal to FNS for approval.		2	0.33	0.66	5.00	3.30	3.30				0
F/R Eligibility	245.6(i)	SAs and LEAs must obtain written consent from parent or guardian prior to use or disclosure for other uses not specified in the regulation.		56	1	56	0.25	14.00	14.00				0
F/R Eligibility	245.6(j)	SAs enter into written agreement with the agency receiving children's free and reduced price eligibility information.		56	1	56	0.25	14.00	14.00				0
Community Eligibility	245.9(f)(6)	State agency to notify LEAs of their community eligibility status as applicable		56	85	4760	0.050	238.93	0.00		238.93		239
Community Eligibility	245.9(f)(7)	State agency to make publically available the names of LEAs and schools receiving notifications		56	1	56	0.017	0.94	0.00		0.94		1
F/R Eligibility	245.11(a)(1) and 245.3(a)	SAs issue prototype free and reduced price policy statement and annually announce the family size income standards to be used in determining eligibility for free or reduced price meals.		56	1	56	0.10	5.60	5.60				0
F/R Eligibility	245.11(g)	SAs notify FNS if TANF is comparable to or more restrictive than AFDC.		56	1	56	0.10	5.60	5.60				0
F/R Eligibility	245.11(h)(4)	SAs submit to FNS upon request, the number of schools on Provision 1, Provision 2 or Provision 3 and extensions.		43	1	43	1.50	64.50	64.50				0
F/R Eligibility	245.11(i)	SAs must collect, analyze, and report to FNS annual verification data from SFAs.	742	56	1	56	4.00	224.00	224.00				0
CIP	245.12(e) and (g)	State agencies that fail to meet the direct certification benchmark must develop and submit a Continuous Improvement Plan within 60 days of notification.		18	1	18	3.00	54.00	54.00				0
<b>State Agency Level Total</b>				56	92.37	5147	0.13	671	431	0	240	0	240
<b>Local Education Agency (LEA) &amp; School Food Authority (SFA) Level</b>													
Community Eligibility	245.6 (c)(6)(i)	SFAs notify households of approval of meal benefit applications.		20,358	306	6,231,888	0.020	124,637.72	125,148.00		-510.28		
Community Eligibility	245.6 (c)(6)(ii)	SFAs must notify households in writing that children are eligible for free meals based on direct certification and that no application is required.		20,358	145	2,942,097	0.020	58,841.94	62,574.00		-3,732.06		
Community Eligibility	245.6 (c)(7)	SFAs provide written notice to each household of denied benefits.		20,358	17	345,256	0.02	6,905.12	7,091.72		-186.60		
Community Eligibility	245.6(j)	SFA must enter into written agreement with the agency receiving children's free and reduced price eligibility information.		20,358	1	20,358	0.166	3,379.43	3,462.43		-83.00		
Community Eligibility	245.6a (c)	SFAs must determine sample size of households to verify eligibility.		20,358	1	20,358	0.33	6,718.14	6,883.14		-165.00		
Community Eligibility	245.6a (f)	SFAs notify households of selection for verification.		20,358	12	244,296	0.25	61,074.00	62,574.00		-1,500.00		
F/R Eligibility	245.6a (h)	SFAs must report verification information to SA.	742	20,858	1	20,858	0.75	15,643.50	15,643.50				0
F/R Eligibility	245.9 (f)	SFAs with schools under Provisions 1, 2, or 3 must identify those schools in its free and reduced price policy statement and certify their eligibility for the first year of operation.		1,092	1	1,092	0.25	273.00	273.00				0
Community Eligibility	245.9(f)(4)(i)	LEAs to submit to State agency documentation of acceptable identified student percentage of LEA school electing the provision		500	1	500	0.0334	16.70	0.00		16.70		16.70
Community Eligibility	245.9(f)(5)	LEA to submit to the State agency for publication a list of eligible and potentially eligible schools and their eligibility status; unless otherwise exempted by State agency		5,159	1	5,159	0.0167	86.16	0.00		86.16		86.16
Community Eligibility	245.9(g)(1) and (2)	LEAs to amend free and reduced price statement and certify that schools meet eligibility criteria		500	1	500	0.250	125.00	0.00		125.00		125.00
F/R Eligibility	245.9 (h)	SFAs with schools under Provision 2 or Provision 3 submit to FNS upon request all data and documentation used in granting extensions.		1,092	1	1,092	0.25	273.00	273.00				0
F/R Eligibility	245.10 (a)	SFAs submit to SA for approval a free and reduced price policy statement.		20,858	1	20,858	0.07535	1,571.45	1,571.45				0
<b>School Food Authority Level Total</b>				20,858	472.618	9,859,544	0.028	280,854	285,494	0	-4,640	0	280
<b>School Level</b>													
<b>School Level Total</b>													0
<b>Household Level</b>													
Community Eligibility	245.6 (a)	Households complete application form for free or reduced price meal benefits.		8,236,529	1	8,236,529	0.07	576,557.03	578,343.01		-1,785.98		-1,785.98
Community Eligibility	245.6a (a)(7)(i)	Households assemble written evidence for verification of eligibility and send to SFA.		189,235	1	189,235	0.50	94,617.29	95,000.00		-382.71		-382.71
Community Eligibility	245.6a (a)(7)(ii)	Households cooperate with collateral contacts for verification of eligibility.		1,892	1	1,892	0.167	316.02	317.30		-1.28		-1.28
<b>Household Level Total</b>				8,236,529	1.02	8,427,656	0.08	671,490	673,660	0	-2,170	0	-2,170
<b>Total Reporting Burden</b>				8,257,443	2.22	18,292,368	0.05	953,015	959,588	0	(6,571)	0	(1,702)

Program Rule	Estimated # Respondents	Responses per Respondents	Total Annual Records	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Current OMB Approved Burden Hrs	Due to Authorizing Statute	Due to Program Change	Due to an Adjustment	Total Difference
F/R Eligibility	8,257,443	0.01	44,224	0.41	18,138	18,138	-	-	0	0
CIP	18.0	1.00	18	3.00	54	54	-	-	0	0
Community Eligibility	61,186.0	298.24	18,248,125	0.05	934,823	941,394	-	(6,570.6)	0	(1,702)
0	-	-	-	-	-	0	-	-	0	0

SUMMARY OF BURDEN RECORDKEEPING & REPORTING

TOTAL NO. RESPONDENTS	8,278,357
AVERAGE NO. RESPONSES PER RESPONDENT	2.213
TOTAL ANNUAL RESPONSES	18,322,111
AVERAGE HOURS PER RESPONSE	0.05234956
TOTAL BURDEN HOURS FOR PART 245 WITH REVISIONS	959,154
CURRENT OMB INVENTORY FOR PART 245	965,645
DIFFERENCE (BURDEN REVISIONS REQUESTED)	-6,491

**ICR #0584-0026, 7 CFR Part 245, Free and Reduced Price Eligibility - Summary**

	Estimated # Respondents	Responses Per Respondent	Total Annual Responses (Col. BxC)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. Dx E)
<b>Recordkeeping</b>					
State Agency Level	56	130.232	7,293	0.237	1,731
School Food Authority Level	20,858	1.076	22,450	0.196	4,408
School Level	-	-	-	-	-
Recordkeeping Total	20,914	1.422	29,743	0.206	6,139
<b>Reporting</b>					
State Agency Level	56	92.274	5,167	0.130	671
School Food Authority Level	20,858	472.698	9,859,544	0.028	280,854
Household Level	8,236,529	1.023	8,427,656	0.080	671,490
Reporting Total	8,257,443	2.215	18,292,368	0.052	953,015
<b>TOTAL BURDEN</b>	<b>8,278,357</b>	<b>2.213</b>	<b>18,322,111</b>	<b>0.05234956</b>	<b>959,154</b>

Date	User Initials
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc
7/26/13	AMc

Vertical line 1

Vertical line 2

Vertical line 3





## Comments

### Comments 1-10 are associated with burden hour changes in existing line items or new burden due to Community Eligibility rule

1) 500 = Estimate of LEAs that will participate in CE provision is based on 3 indicators: 1) 500 is approximately 20% of the current (equal to or greater than 40% ISP) LEAs (2,563). Currently the "take rate", those eligible that choose to participate, in the phase is nearly 10 percent; with increase exposure the take rate could be expected to double. 2) 500 is 70% of the total LEAs with an ISP greater than 65% (716). With a 65% ISP, the LEA or school would attain 100 percent reimbursement rate for meals served multiplied by the 1.6 factor thus maximizing the fiscal benefits. 3) Provision 2 and 3 estimated 500 LEAs would participate when the proposed rule was submitted (circa 1990).

2) 4,769 = Estimate of potential eligible LEAs to participate in CE provision includes those with identified students percentage of greater than 30% but less than 40% (2,206) + LEAs with equal to or greater than 40% (2,563) based on results from 2011-12 FNS-742 Eligible Not Verified (FENV) student population data against total student population.

3) 6,231,886 Household applications is a reduction of 25,514 household applications from the previous estimated number. 25,514 is 3 percent of the total applications (free and reduced priced) from LEAs with 65% or greater ISP (36,449). This corresponds to the reduction of 500 (from 20,858 to 20,358) that is 70% of total LEAs with 65% or greater ISP (716). Data is from SY 2011-12 FNS-742.

4) 2,942,097 households is a reduction of households by 186,603 from the previous estimated number. 186,603 households equal 5 percent of the total direct certified students from LEAs with 65% or greater ISP (266,576). This corresponds to the LEA reduction of 500 (from 20,858 to 20,358) that is 70% of total LEAs with 65% or greater ISP (716). Data is from SY 2011-12 FNS-742.

5) 345,256 households is a reduction of households by 9,330. 9,330 is 5 percent of the households cited in Comment 4) above. It is estimated that 5 percent of hh receive notices.

6) 249,531 households is a reduction of households by 765 from previous estimate. 765 is equal to 3 percent of total applications from LEAs with 65% or greater ISP (25,514) as described in Comment 3) above. It is estimated 3 percent of applicable hh are selected for verification.

7) 5,159 is the number of LEA from the 16 States + PR and VI (18) that currently don't perform state level direct certification matches per data from Viv Lees (FNS State System Branch). Thirty-six State agencies currently perform state level direct certificate matches per data from Viv Lees (FNS State System Branch). The number of LEAs from 2011/12 FNS-742 data + 44 LEAs in PR + 4 LEAs in VI (SAE data).

8) 8,236,529 households is a reduction of 25,514 from the previous estimate. 25,514 is the number of hh applications estimated for participating LEAs as described in Comment 3) above and thus not required to submit applications for benefits.

9) 189,235 households is a reduction of 765 from previous estimate. 765 is 3 percent of households that are estimated to not submit application (25,514) as described on Notes tab, Comment 3).

10) 1,892 households is a reduction of 8 from the previous estimate. 1,892 is 1 % of household applications subject to verification as described on Notes tab, Comment 8). It is estimated that 1% of hh would be subject to verification that would be subject to collateral contacts for verification of eligibility.



