

USDA NATIONAL HUNGER CLEARINGHOUSE DATABASE FORM

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APPENDIX B: USDA SUMMER MEAL SITE ENTRY FORM FOR STATE AGENCIES FORM FNS
543-A

APPENDIX C: SAMPLE USDA NATIONAL HUNGER CLEARINGHOUSE NEWSLETTER

APPENDIX D: PUBLIC COMMENT TO 60-DAY NOTICE

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. Section 26 of the National School Lunch Act, which was added to the Act by Section 123 of P.L. 102-446 on November 2, 1994, mandates that FNS enter into a contract with a non-governmental organization to establish and maintain a clearinghouse to provide information to non-governmental groups located throughout the United States that assist low-income individuals or communities regarding food assistance, self-help activities to aid individuals in becoming self-reliant, and other activities that empower low-income individuals or communities to improve the lives of low-income individuals and reduce reliance on Federal, State, or local government agencies for food or other assistance.

FNS contracted with the New York City Coalition Against Hunger (NYCCAH), of New York, New York on December 1, 2014 to establish and maintain a USDA National Hunger Clearinghouse. The contract will expire on September 30, 2015 under Section 26 amended December 13, 2010 in P.L. 111-296, Section 409. It is expected that the contract will first continue through a Continuing Resolution, and then formally extended for a time to be determined, which will permit data to be collected as it is now.

The USDA National Hunger Clearinghouse collects, develops and distributes information and resources to help build the capacity of emergency food providers to address the immediate needs of

struggling families and individuals while promoting self-reliance and access to healthy food. The Clearinghouse includes the USDA National Hunger Hotline, (1-866-3 HUNGRY or 1-866-348-6479, and 1-877-8-HAMBRE or 1-877-842-6273), which refers people in need anywhere in the U.S. to food pantries, soup kitchens, government programs and model grassroots organizations.

FNS began data collection activities for the National Hunger Clearinghouse in May 1996. The USDA National Hunger Clearinghouse Database Form (FNS-543) (Appendix D) is sent to businesses (for profit organizations) and not for profit institutions that assist low-income individual or communities. The organizations submit data annually about the type of services they provide and their respective target markets. The information submitted via form FNS-543 is maintained in the USDA National Hunger Clearinghouse Database. The information is used by FNS to fight hunger and improve nutrition by increasing participation in the FNS nutrition programs through the development, coordination, and evaluation of strategic initiatives, partnerships, and outreach activities. This database enables FNS to get food and self-help resources to those who need it most. Information is collected annually and maintained by the USDA National Hunger Clearinghouse contractor.

The spreadsheet FNS-543A is the instrument used to voluntarily collect information about summer meal sites from State agencies. It collects site name, location and operating details such as dates and times of the day that the site is in operation. FNS-543A is part of the information collection for FNS-543 because summer meal site information is part of the National Hunger Clearinghouse.

Thus, FNS is renewing this data collection in order to continue to collecting information mandated by Congress.

- 2. Indicate how, by whom, how frequently, 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.**

The information collected voluntarily on the FNS-543 provides a resource for groups that assist low-income individuals or communities regarding nutrition assistance programs or other assistance.

Organizations will provide important information such as operation hours, phone numbers, contact names, target population, types of services provided to the community, the organizations' service locations, children services provided, whether the organization provides counseling or educational or job training services, health care assistance, homeless or housing services and any food assistance or government program assistance which will enable service groups to improve assistance to the target audience. The information is submitted to FNS almost exclusively through an online web form but paper copies of the form can be submitted as well.

The FNS-543A is a spreadsheet that State agencies are required to submit with sites that provide summer meals to children 18 years and younger in low-income communities during the summer. The spreadsheet is submitted to FNS via email once annually.

The information collected will be submitted using the FNS-543 and 543-A forms. The information is used by policy officials at the Office of the Deputy Secretary for Food, Nutrition and Consumer Services at USDA. Other interested parties may include nutrition or health education professionals, state or local government health officials, nutrition councils, public interest advocates, private foundations and corporate officials.

- 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.**

In compliance with the Government Act of 2002, FNS has reviewed this information collection in an effort to make electronic collection available to respondents. The USDA National Hunger Clearinghouse uses state-of-the-art computer and telecommunications technologies, when feasible, to connect to the targeted audience. The information is available free of charge through a toll-free telephone line (1-866-3HUNGRY or 1-877-8HAMBRE) and via the World Wide Web at www.nhc.fns.usda.gov. Information on the USDA National Hunger Hotline, Clearinghouse information database, food and nutrition webinars and other helpful resources are disseminated through monthly newsletters sent to an email list of organizations that are part of the Clearinghouse. Organizations may electronically submit their information to be included in the Clearinghouse database at <http://nhc.fns.usda.gov/nhc/submit>. Based on 2015 data, FNS estimates that approximately 100% of our respondents submitted data for the FNS 543 and none of respondent submitted data for the FNS 543-A electronically. This form is submitted via email or mail in to FNS.

- 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.**

The data requirements for this data collection have been carefully reviewed to determine whether the needed information is already available. Efforts to identify duplication included a review of FNS reporting requirements, state administrative agency reporting requirements, and special studies by government and private agencies. Although there are similar data collections, those do not meet our

needs. FNS is mandated to enter into a contract with a non-governmental organization to establish and maintain a clearinghouse. The FNS managed data collection is necessary to meet our needs.

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

The burden for this information collection is minimal and participation is voluntary.

Information being requested or required has been held to the minimum required for the intended use.

The respondent categories related to Business-for-not-for-profit are considered small businesses or other small entities. The community-based organizations (Food Banks) engaged in community outreach activities.

The sizes of the organizations vary, ranging from large national groups to small volunteer-run grassroots organizations. FNS estimates out of 600 respondents (using FNS 543) approximately 50 percent are considered small business or entities.

The FNS 543 is easily read online at nhc.fns.usda.gov. The information is readily available to the respondents and they can start and stop at their leisure when visiting the website. There have been efforts to incorporate multiple response methods by making submission of the FNS-543 available in paper and web form. The FNS-543A can be only be submitted via email.

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.

This is an ongoing data collection. If this data is not collected or is collected less frequently, FNS'

ability to aid low-income individual or communities to become more self-reliant and empowered, improve the lives of low-income individual and reduce reliance on the Federal, State, or local governmental agencies for food or other assistance will be diminished. The database provides valuable information to groups that assist low-income individuals or communities regarding nutrition assistance programs or other assistance. The Clearinghouse database is the only readily available source of current information on effective program models, pending legislation and rule makings, surplus and emergency food distribution networks, and USDA food programs and policies.

In order to maintain the database, updated program and mailing contact information must be collected from organizations contained in the database once each year.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- **requiring respondents to report information to the agency more often than quarterly;**
 - **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 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 Federal Register Notice announcing the 60-day notice was published on June 1, 2015 (Volume 80, FR 30998). In response to this notice FNS received one comment (Appendix D), which was in support of the collection.

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.

The Office of External and Government Affairs and Communications Division, both within the Office of the Chief Communications Officer, met on January 30, 2015 at Park Office Center in Alexandria, VA to discuss the fields on form FNS-543. The decision was made to decrease the

number of required fields on the form. The FNS Office of Information Technology (OIT), Child Nutrition Division (CND) and Office of the Chief Communications Officer (OCCO) hosted a web meeting on April 15, 2015 to discuss the name and setup of the FNS-543A spreadsheet form.

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

No payments or gifts 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.**

Agency complies with the Privacy Act of 1974.

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.**

This information collection does not involve questions of a sensitive nature.

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

- **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 burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

Table 1 and 2 shows the yearly estimated burden for the 600 respondent included in this data collection for FNS-543 & 543-A are displayed separately for each Affected public (55 State, Local and Tribal agencies and 600 Business-for-not-for-profit) and respondent and instrument types totaled for the entire data collection. The overall burden for this collection is 110 burden hours and 655 responses. The total annual estimated burden for the FNS-543; 50 burden hours reporting hours and the FNS-543A is 60 burden hours for reporting hours. The total estimated annual responses for this collection are 655 and are broken down by each form per affected public. The FNS-543 is 600 responses and the total estimated number of responses for FNS-543A is 55 total annual responses. There is no recordkeeping burden imposed on the respondents in this data collection.

The calculation of the burden for each of these components is described below:

- **FNS-543.** Six hundred (600) Businesses submit 1 response annually for a total of 600 annual responses. The annual reporting burden for the FNS-543-A report is 0.0833 per respondent to complete the form is 5 minutes (0.0833 hours) (600 Business x 1 annual report= 600 total annual responses x 5 minutes (0.0833 hours) per response= 49.98 burden hours rounded up to 50).
- **FNS-543-A.** Fifty-three (55) State Agencies (SA) submit 1 response annually for a total of 55 annual responses. The annual burden for the FNS-543 is 59.58 hours (rounded to 60 burden hours). The reporting burden is estimated to be 5 minutes (1.05 hours) annually per respondent (55SA x 1 annual report= 55 total annual responses x 1.08333 hours per response = 59.58 (rounded to 60 burden hours for the SF 543).

BUSINESS REPORTING BURDEN FOR FNS-543

Estimated Number of Respondents: 600

Estimated Number of Responses per Respondent: 1

Estimated Total Annual Responses: 600

Estimated Time per Response: 5 minutes (0.0833 hours)

Estimated Total Annual Burden on Respondents: 49.98 hours rounded up to 50 hours

STATE AGENCY REPORTING BURDEN FOR FNS-543-A

Estimated Number of Respondents: 55

Estimated Number of Responses per Respondent: 1

Estimated Total Annual Responses: 55

Estimated Time per Response: 1.05 hours (1.0833 minutes).

Estimated Total Annual Burden on Respondents: 59.59 hours rounded up to 60 hours

There are 655 (600 Business + 55 States) respondents involved in this data collection. The total reporting burden for this information collection is 110 total annual burden hours and 655 total annual responses. There is no recordkeeping burden associated with this information collection.

TABLE 1. BUSINESS ESTIMATED ANNUAL REPORTING HOUR BURDEN

FNS-543 (Business Agency Reporting Burden)						
Affected public	Respondent Type	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response	Estimated Total Hours
Business	Food Banks	300	1	300	0.0833	24.99
	Business and Other For Profit	100	1	100	0.0833	8.33
	Not For Profit	200	1	200	0.0833	16.66
	Total Reporting Burden	600		600		49.98

TABLE 2. STATE AGENCY ESTIMATED ANNUAL REPORTING HOUR BURDEN

FNS-543-A (State Agency Reporting Burden)

Affected public	Respondent Type	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response	Estimated Total Hours
State Agencies	State Agency Administrative Staff	55	1	55	1.0833	59.5815
	Total Reporting Burden	55	-	55	-	59.58

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

A wide variety of people affiliated with an organization may complete the FNS-543 form—from executives to volunteer interns. The estimate of respondent cost is based on the burden estimates developed in 12(a) above.

The total annual respondent cost for forms FNS-543 and 543A is \$2,776.42. Wage and budget analysts are most likely to complete the FNS-543A at State agencies. Based on the Bureau of Labor Statistics May 2014 Occupational and Wage Statistics – 13-2031 (<http://www.bls.gov/oes/current/oes132031.htm>), hourly mean wage for budget analyst functions performed by State and local agency staff are valued at \$30.63 per staff hour, thus the annual respondent cost is estimated at \$1,837.80.

Community and Social Service Specialists at community food, housing and emergency relief organizations are the most likely to complete the FNS-543 at food banks, businesses and other for profit and not for profit organizations. They have a mean hourly wage of \$17.13 according to the Bureau of Labor Statistics as well (<http://www.bls.gov/oes/current/oes211099.htm>), thus the annual respondent cost is estimated at \$856.16.

- 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 capital/start-up or ongoing operational/maintenance cost associated with this information collection.

- 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.**

The total estimated cost to the Federal Government for this information collection is \$293,551.20. The annual hours worked on preparing this data collection and the hours worked to monitor the clearinghouse is approximately 40% of an employee's time. For the purpose of this annualized cost estimate, the employee is assumed to be a GS-12 Step 1 for the Washington D.C. locality area using the Federal GS Pay Scale published in 2015, which has an annual salary of \$76,378.20. An estimated \$10,000 is spent annually in staff time from other miscellaneous employees that contribute their time to the Clearinghouse. An estimated \$3,000.00 is spent annually on travel costs to conduct site visits to the Clearinghouse contractor and the contract has an annual cost of \$250,000. The calculations for the estimated cost are = $\$76,378 * 40\% + \$10,000 + \$3,000 + \$250,000 = \$293,551.20$.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a revision of a currently approved collection. The current burden inventory for the FNS 543 used by Business in this collection is 1,292 burden hours and 41,750 total annual responses. There are 292 hours & 1,750 responses for FNS 543 and 1,000 hours & 40,000 responses for FNS-543A.

The number of estimated respondents using FNS 543 has decreased from 1,750 to 600; a difference of -1,150 respondents and identical decrease for the total annual responses. The program adjustment is due to a decreased number of expected respondents. There is a decrease in the burden hours for FNS 543, which decreased from 292 to 110 burden hours needed. This reflects a decrease of -182 burden hours for this form. These program adjustments are due to a decreased estimate of the time per response. The current time per responded is 10 minutes, but the revised and streamlined FNS-543 form now takes 5 minutes per respondent.

Additionally, there are program adjustments due to the number of State Agency respondents using the FNS-543-A form, which increased from 53 to 55; a total increase of 2 respondents. The current burden inventory for FNS 543-A is 1,000 burden hours and 40,000 responses. The requested burden for this form is 55 total annual responses and 60 burden hours. The revisions are due to program changes in the decreased frequency to one submission annually which reflects a decrease of -39,945 responses and -940 burden hours for FNS 543A.

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

The information will be published to the USDA National Hunger Clearinghouse website at

www.nhc.fns.usda.gov. The information will be collected through an online submission system identified as FNS 543 and 543-A then published to the public website.

- 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.