

Estimate of the Information Collection Burden for the
Revision of National School Lunch Program (OMB# 0584-0006) due to the Merging of OMB#s
0584-0565, 0584-0585, and 0584-0567 into the Collection

This document explains the calculation of the revisions to the information collection burden for the National School Lunch Program, OMB #0584-0006. The information collection is being revised to merge the reporting and recordkeeping burdens currently approved in OMB #s 0584-0565, 0584-0585, and 0584-0567 into this collection.

OMB #0584-0565 7 CFR Part 210 National School Lunch Program: School Food Service Account Revenue Amendments Related to the Healthy, Hunger-Free Kids Act of 2010 was approved by OMB for three years on February 6, 2012. This information collection was associated with FNS Interim rule, 7 CFR Part 210, “National School Lunch Program: School Food Service Account Revenue Amendments Related to the Healthy, Hunger-Free Kids Act of 2010.” The rule contained reporting and recordkeeping requirements that had burden impacts for both the State Agencies (SA) and the School Food Authorities (SFA), as outlined below under OMB# 0584-0565. This collection was merged into OMB# 0584-0006 and approved by OMB on March 13, 2013.

OMB # 0584-0585 Direct Certification and Certification of Homeless, Migrant and Runaway Children for Free School Meals was approved by OMB for three years on August 14, 2013. This information collection was associated with FNS interim final rule, “Direct Certification and Certification of Homeless, Migrant and Runaway Children for Free School Meals.” The rule contained recordkeeping requirements with burden impacts for the SFAs which are outlined below under OMB# 0584-0585. This collection was merged into OMB# 0584-0006 and approved by OMB on September 26, 2013.

OMB # 0584-0567 Certification of Compliance with Meal Requirements for the National School Lunch Program under the Healthy, Hunger-Free Kids Act of 2010 (a.k.a. “Six-Cent Rule”) was approved by OMB for three years on June 20, 2012 (with an adjustment to the burden approved by OMB on December 30, 2013). This information collection was associated with the FNS Interim Rule, 7 CFR Part 210 “Certification of Compliance with Meal Requirements for the National School Lunch Program Under the Healthy Hunger-Free Kids Act of 2010.” The rule contained reporting requirements that had burden impacts for both the SAs and the SFAs. It also contained recordkeeping requirements that had burden impacts for the SFAs. These requirements are outlined below under OMB# 0584-0567.

The terms of clearance/ICRs for these information collections indicated that the requirements and burden for these collections would be merged with OMB# 0584-0006.

OMB# 0584-0565 7 CFR PART 210 NATIONAL SCHOOL LUNCH PROGRAM: SCHOOL FOOD SERVICE ACCOUNT REVENUE AMENDMENTS RELATED TO THE HEALTHY, HUNGER-FREE KIDS ACT OF 2010

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. Section 210.14(e)(7) states that SAs shall report the paid student lunch prices reported by the SFAs and submit the findings to FNS. FNS estimates that there are 57 SAs that will each file 1 report annually for a total of 57 responses ($57 \times 1 = 57$). The estimated average number of burden hours per response is 10 hours resulting in an increase to the Information Collection burden of 570 hours ($57 \times 10 = 570$).

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFA)

1. Section 210.14(e)(7) states that each SFA must report the actual paid student lunch prices to the SA annually for each NSLP school. FNS estimates that there are 20,858 SFAs that will each file 1 report annually for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an increase to the Information Collection burden of 5,214.50 hours ($20,858 \times 0.25 = 5,214.50$).

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. Section 210.14(e)(7) states that SAs must maintain records of paid reimbursable lunch prices that are obtained from the SFAs. FNS estimates that there are 57 SAs that will each file 365.93 records annually for a total of 20,858 responses ($57 \times 365.93 = 20,858$). The estimated average number of burden hours per response is 12 minutes (0.2 hours) resulting in an increase to the Information Collection burden of 4,171.996 hours ($20,858 \times 0.20 = 4,171.996$).

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFA)

1. Section 210.14(e)(1-5) states that SFAs must maintain records of their calculations of the average price of paid reimbursable lunches and adjustments. FNS estimates that there are 20,858 SFAs that will each file 1 record annually for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 5 hours resulting in an increase to the Information Collection burden of 104,290 hours ($20,858 \times 5 = 104,290$).
2. Section 210.14(f) states that SFAs must maintain records documenting the revenue generated from the sale of nonprogram foods. FNS estimates that there are 20,858 SFAs that will each file 1 record annually for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 10 hours resulting in an increase to the Information Collection burden of 208,580 hours ($20,858 \times 10 = 208,580$).

OMB# 0584-0585 DIRECT CERTIFICATION AND CERTIFICATION OF HOMELESS, MIGRANT AND RUNAWAY CHILDREN FOR FREE SCHOOL MEALS

REPORTING REQUIREMENTS

No burden identified for this section.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFA)

1. Sections 210.9(b)(19) and 210.15(b)(4) state that local educational agencies must maintain records for directly certified children receiving SNAP benefits. FNS estimates that there are 20,858 local educational agencies that will each file 3 records annually for a total of 62,574 responses ($20,858 \times 3 = 62,574$). The estimated average number of burden hours per response is 30 minutes (0.50 hours) resulting in an increase to the Information Collection burden of 31,287 hours ($62,574 \times 0.50 = 31,287$).
2. Sections 210.9(b)(19) and 210.15(b)(4) state that local educational agencies must maintain records for children that are certified based on TANF or FDPIR, or are homeless, runaway, or migrant. FNS estimates that there are 20,858 local educational agencies that will each file 1 record annually for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 1 hour resulting in an increase to the Information Collection burden of 20,858 hours ($20,858 \times 1 = 20,858$).

OMB# 0584-0567 CERTIFICATION OF COMPLIANCE WITH MEAL REQUIREMENTS FOR THE NATIONAL SCHOOL LUNCH PROGRAM UNDER THE HEALTHY, HUNGER-FREE KIDS ACT OF 2010 (A.K.A. "SIX-CENT RULE")

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. Section 210.7(d)(1)(iv) states that SAs review submitted certification materials related to meal compliance and notify SFAs of the certification determination. FNS estimates that there are 56 SAs that will each file 372 reports annually for a total of 20,832 responses ($56 \times 372 = 20,832$). The estimated average number of burden hours per response is 2 hours resulting in an increase to the Information Collection burden of 41,664 hours ($20,832 \times 2 = 41,664$).
2. Section 210.5(d)(2)(ii) states that SAs submit a quarterly report (format to be determined) to FNS detailing the disbursement of performance based reimbursement to SFAs. FNS estimates that there are 56 SAs that will each file 4 reports (one each quarter) annually for a total of 224 responses ($56 \times 4 = 224$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an increase to the Information Collection burden of 56 hours ($224 \times 0.25 = 56$).

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFA)

1. Section 210.17(d)(2) states that each SFA must submit certification materials to the SAs to support receipt of performance based reimbursement. FNS estimates that there are 20,858 SFAs that will each file 1 report annually for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 4.5 hours resulting in an increase to the Information Collection burden of 93,861 hours ($20,858 \times 4.5 = 93,861$).
2. Section 210.7(d)(2) also states that each SFA must submit an annual attestation of compliance with meal pattern and nutrition requirements. FNS estimates that there are 20,858 SFAs that will each file 1 report annually for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an increase to the Information Collection burden of 5,215 hours ($20,858 \times 0.25 = 5,215$).

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

No burden identified for this section.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFA)

- 1. Section 210.7(d)(2) states that the SFAs maintain certification documentation to support performance based reimbursement. FNS estimates that there are 20,858 SFAs that will each respond 2 times a year for a total of 41,716 responses ($20,858 \times 2 = 41,716$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an increase to the Information Collection burden of 10,429 hours ($41,716 \times 0.25 = 10,429$).**
- 2. Section 210.7(d)(2) also states that SFAs maintain documentation related to the attestation of compliance submitted to the SA as an attachment to the written agreement required in 210.9(b). FNS estimates that there are 20,858 SFAs that will each manage records once a year for a total of 20,858 responses ($20,858 \times 1 = 20,858$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an increase to the Information Collection burden of 5,215 hours ($20,858 \times 0.25 = 5,215$).**