

Estimate of the Information Collection Burden for the
National School Lunch Program (OMB #0584-0006)

This document explains the calculation of the information collection burden for the National School Lunch Program - 7 CFR Part 210, OMB control #0584-0006, for the 2016 renewal.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Sections 210.18(d)(2); 210.18(i); 210.18(o)(1); and 210.20(a)(5) require SAs to report to FNS the names of large SFAs exceeding administrative review thresholds. FNS estimates there are 56 SAs that will each file 1 report annually for a total of 56 responses ($56 \times 1 = 56$). The estimated average number of burden hours per response is 0.2 resulting in an estimated total annual burden hours of 11.2 ($56 \times 0.2 = 11.2$).
2. Sections 210.18(j) require SAs to provide written notification to SFAs of review findings, corrective actions, deadlines for completion, and potential fiscal action with right to appeal. FNS estimates there are 56 SAs that will each file 118 reports annually for a total of 6,608 responses ($56 \times 118 = 6,608$). The estimated average number of burden hours per response is 8 resulting in an estimated total annual burden hours of 52,864 ($6,944 \times 8 = 52,864$). **This burden is being reduced by 672 hours due to six fewer records per record keeper, which is offset by an increase of 37,767 hours due to a correction to increase the burden hours per report, for a total increase of 37,095 hours. In addition, the 1,881 hours associated with 210.18(g)&(h) for conducting the review to generate the report was merged into this requirement. These hours were approved as part of the reporting burden during the previous renewal so the merging of these hours does not increase the burden.**
3. Sections 210.18(n)&(o)(2); and 210.20(a)(6) require SAs to report to FNS the results of reviews by March 1 of each school year, on a form (FNS-640) designated by FNS. FNS estimates there are 56 SAs that will each file 1 report annually for a total of 56 responses ($56 \times 1 = 56$). The estimated average number of burden hours per response is 1 resulting in an estimated total annual burden hours of 56 ($56 \times 1 = 56$).
4. Section 210.19 (f) requires the SA to provide the CACFP SA with a list of all NSLP schools in which at least 50% of the children are eligible for free or reduced price meals. FNS estimates that 56 SAs will each file 1 report annually for an estimated number of responses of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per response is 2 resulting in estimated total annual burden hours of 112 ($56 \times 2 = 112$). **This burden was moved from RECORDKEEPING to REPORTING.**
5. Section 210.20(a)(8) requires SAs to report to FNS the results of schools compliance with the food safety inspection requirement (i.e. number of inspections). FNS estimates there are 56 SAs that will each file 1 report annually for a total of 56 responses ($56 \times 1 = 56$). The

estimated average number of burden hours per response is 1.5 resulting in an estimated total annual burden hours of 84 ($56 \times 1.5 = 84$).

Activity no longer listed separately due to merge into another activity as noted above:

Section 210.18(g)&(h) requires SAs to verify compliance with critical and general areas of review as a part of conducting administrative reviews. FNS estimates that there are 57 SAs that will each file 1 record annually for a total of 57 responses ($57 \times 1 = 57$). The estimated average number of burden hours per record is 33 hours resulting in an estimated total burden of 1,881 hours ($57 \times 33 = 1881$). This burden is being merged with the reporting burden for 210.18(j) for the report to SFAs of findings as this burden is for the analysis of information which generates the report and is not a separate report.

Activities no longer required from prior approval:

Sections 210.5(d)(2) and 210.20(a)(2) require each SA shall also submit to FNS a quarterly Financial Status Report (FNS-777) on the amounts of Federal Program funds expended and obligated. FNS estimates that 56 SAs will each file 4 reports annually for a total of 224 responses ($56 \times 4 = 224$). The estimated average number of burden hours per response is 0.25 resulting in estimated total burden hours of 56 ($224 \times 0.25 = 56$). This burden is currently captured in the OMB #0584-0594 information collection for the Food Program Reporting System (FPRS). Therefore, 56 hours of duplicated burden is being removed from this information collection with this revision.

Section 210.7(d)(1)(v) requires that SAs review certification documentation submitted by SFAs to ensure compliance with meal pattern requirements and notify SFAs of the certification determination. FNS estimates that 56 SAs will notify an average of 372 SFAs annually for a total of 20,832 responses ($56 \times 372 = 20,832$). The estimated average number of burden hours per response is 2.0 resulting in estimated total burden hours of 41,664 ($20,832 \times 2 = 41,664$). This burden is being removed from this information collection with this revision as it was a one-time requirement and is no longer required.

Sections 210.14(e)(7) and 210.20(a)(9) require that SAs report to FNS the paid student lunch prices reported by each SFA. FNS estimated that 57 SAs will each submit 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 estimated total annual burden of 570 hours ($57 \times 10 = 570$). This data is reported on the FNS-828 form which is currently captured in the OMB #0584-0594 information collection for FPRS. Therefore, 570 hours of duplicated burden is being removed from this information collection with this revision.

Section 210.25 requires that whenever it is determined that a State agency has materially failed to comply with the provisions of this part, or with FNS guidelines and instructions, FNS may suspend or terminate the Program in whole, or in part, or take any other action as may be available and appropriate. A SA may also terminate the Program by mutual agreement with FNS. FNS and the SA shall comply with the provisions of 7 CFR part 3016 concerning grant suspension, termination and closeout procedures. The SA shall apply

these provisions, or the parallel provisions of 7 CFR Part 3019, as applicable, to suspension or termination of the Program in SFAs. FNS estimates that none of the 56 SAs will annually encounter this situation. Therefore, the previously allocated burden for 56 SAs to file 2 reports for a total of 56 responses (56 X 2 = 112) with an estimated average number of burden hours per response as 3.2 resulting in an estimated total burden hours of 358 (112 X 3.2 = 358) is removed from this information collection with this revision.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs)

1. Section 210.9(b)(21) requires SFAs to provide the SA with a list of all schools with at least 50% of enrolled children determined eligible for free or reduced price meals as of the last day of October and, upon request, the attendance boundaries for those schools. FNS estimates 19,822 SFAs will each file 1 report annually for a total of 24,778 responses ($19,822 \times 1.25 = 24,778$). The estimated average number of burden hours per response is 0.25 hours resulting in an estimated total annual burden hours of 6,194 ($24,778 \times 0.25 = 6,194$). **This burden is being increased by 3,714 hours due to correcting the number of respondents to include all SFAs and decreased by 1242 hours due to reducing the average burden hours per response. This burden requirement includes the merging of 1238 hours of burden for the requirement that was previously listed separately to provide the attendance boundaries (i.e. previously approved as 39,752 hours; decreased by 38,514 hours to accurately reflect the burden hours as being “upon request”). Therefore, this burden has an overall decrease of 36,042 hours ($3,714 - 1,242 - 38,514$).**
2. Section 210.9(c)(7) requires SFAs to conduct reviews of each afterschool care program that participates in the NSLP. FNS estimates 482 SFAs will each file 2 responses annually for a total of 964 responses ($482 \times 2 = 964$). The estimated average number of burden hours per response is 0.25 hours resulting in an estimated total annual burden hours of 241 ($964 \times 0.25 = 241$).
3. Sections 210.15(a)(1) and 210.8(b)&(c) require SFAs to submit to the SA monthly claims for reimbursement and numbers of enrolled children by category for the month of October. FNS estimates 19,822 SFAs will each file 10.15 reports annually for a total of 201,193 responses ($19,822 \times 10.15 = 201,193$). The estimated average number of burden hours per response is 1 hour resulting in an estimated total annual burden hours of 201,193 ($201,193 \times 1 = 201,193$). **This burden is being decreased by 62,312 hours due to correcting the number of responses per respondent and decreased by 15,540 hours due to reducing the number of SFAs and decreased by 99,110 hours due to reducing the burden hours per response from the use of electronic systems. This burden includes merging the 1,043 hours of burden for revised claims (previously listed separately) and merging the 1,669 hours of burden for October data (previously listed separately for 210.8(c)) which is reported on the October claim for reimbursement. Therefore, this burden has an overall decrease of 176,962 hours ($-62,312-15,540-99,110$).**
4. Sections 210.15(a)(2)&(4) and 210.9(a)&(b) and 210.7(d)(2) require SFAs to submit an application to the SA for a school to operate the Program, specify commodity preference, and

enter into an agreement with the SA, including an annual attestation of compliance with meal pattern and nutrition requirements. FNS estimates there are 19,822 SFAs that will each file 1 report annually for a total of 19,822 responses ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per response is 0.25 hours resulting in estimated total annual burden hours of 4,956 ($19,822 \times 0.25 = 4,956$). **This previously approved burden of 13 hours is being merged with the approved burden of 5,215 hours for the addendum to the agreement for the annual attestation of compliance (from 210.7(d)(2)). This revision reflects the number of respondents as all SFAs and is decreased by 273 hours due to fewer SFAs.**

5. Sections 210.15(a)(3) and 210.18(k)(2) require SFAs to submit to the SA a written response to reviews documenting corrective action taken for Program deficiencies. FNS estimates 6,607 SFAs will each file 1 report annually for a total of 6,607 responses ($6,607 \times 1 = 6,607$). The estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 52,856 ($6,607 \times 8 = 52,856$). **This burden is being decreased by 2,256 hours due to fewer SFAs and increased by 13,214 hours due to an adjustment to increase in the burden hours per response for a total increase of 10,958 burden hours.**
6. Section 210.15(a)(7) requires SFAs to report to the SA the number of food inspections obtained by each school. FNS estimates 19,822 SFAs will each file 1 report annually for a total of 19,822 responses ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per response is 0.50 hours resulting in an estimated total annual burden hours of 9,911 ($19,822 \times 0.5 = 9,911$). **This burden is being decreased by 518 hours due to 1036 fewer SFAs.**
7. Sections 210.15(a)(8) and 210.14(e)(7) require SFAs to report to the SA the prices of paid lunches for each school. FNS estimates 19,822 SFAs will each file 1 report annually for a total of 19,822 responses ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per response is 0.25 hours resulting in an estimated total annual burden hours of 4,956 ($19,822 \times 0.25 = 4,956$). **This burden is being decreased by 259 hours due to 1036 fewer SFAs.**

Activities no longer required from prior approval:

Section 210.7(d)(2) requires that SFAs submit certification documentation to the SA for performance based reimbursement. FNS estimates that 20,858 SFAs will each submit 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 resulting in an estimated total burden hours of 93,861 ($20,858 \times 4.5 = 93,861$). This burden is being removed from this information collection with this revision as it is no longer required (a one-time occurrence).

AFFECTED PUBLIC: SCHOOLS

1. Section 210.13(b) requires schools to post the most recent food safety inspection and provide a copy upon request. FNS estimates that 101,332 schools will each file 2 reports annually for a total estimated number of responses of 202,664 ($101,332 \times 2 = 202,664$). The estimated average number of burden hours per response is 0.1 resulting in an estimated total annual burden hours of 20,266 ($101,332 \times 0.1 = 20,266$). **This burden of 16,890 hours is being moved from RECORDKEEPING to REPORTING. This burden is also being increased by an additional 3,376 hours due to increasing the burden hours per response. (In ROCIS, this burden is listed under third-party disclosure).**

Activities from prior approval being removed with this revision:

Section 210.9(b) requires the SFA to enter into an agreement with the SA that includes a requirement for schools to record daily counts of school meals at the point of service. FNS estimates there are 101,747 schools that will each file 10 reports annually for a total of 1,017,470 responses ($101,747 \times 10 = 1,017,470$). The estimated average number of burden hours per response is 0.5 hours resulting in estimated total annual burden hours of 508,735 ($1,017,470 \times 0.5 = 508,735$). This burden is already accounted for as a SFA burden and also as a school recordkeeping burden), therefore, the duplication in burden is being removed.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. Sections 210.20(b)(1)&(2); 210.23(c); and 210.5 require the SA to maintain accounting records and source documents to control the receipt, custody and disbursement of Federal NSLP funds, including documentation to support all SFA claims paid by the SA (FNS-10). FNS estimates that 56 SAs will each file 354 reports annually for a total estimated number of records of 19,824 ($56 \times 354 = 19,824$). The estimated average number of burden hours per record is 3 resulting in an estimated total annual burden hours of 59,472 ($19,824 \times 3 = 59,472$). **This burden is being increased by 1,610 hours due to a correction in the number of records per record keeper and the number of burden hours per record.**
2. Sections 210.20(b)(3) and 210.17(g)&(h) require the SA to maintain documentation to support the amount of State funds reported (FNS-13) for State revenue matching requirements. FNS estimates that 56 SAs will each file 1 report annually for a total estimated number of records of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per record is 1 resulting in an estimated total annual burden hours of 56 ($56 \times 1 = 56$). **This is a SA burden and was moved from the SFA section; therefore, the number of respondents is being corrected and reduced which also reduces the burden by 20,802 hours due to this correction.**
3. Sections 210.20(b)(6); 210.18(f)(p)(k)(l)(m); and 210.23(c) require the SA to maintain records of all reviews and audits (including Program violations, corrective action, fiscal action, and withholding of payments). FNS estimates that there are 56 SAs that will each file 118 records annually for a total of 6,608 records ($56 \times 118 = 6,608$). The estimated average number of burden hours per record is 8 hours resulting in an estimated total annual burden

hours of 52,864 hours. (6,608 x 8 = 52,864). **This burden is being reduced by 186 hours due to one less record keeper and increased by 2,774 hours due to about 25 more records per record keeper due to a Program change for a three year review cycle and increased by a merge of 39,648 hours (previously incorrectly approved as SFA burden of 41,898 hours with a current decrease of 2250 hours due to fewer SFAs) moving the burden from the SFA to the SA.**

4. Sections 210.20(b)(8); 210.19(c); and 210.18(p) require the SA document fiscal action taken to disallow improper claims submitted by SFAs, as determined through claims processing, reviews and audits. FNS estimates that there are 56 SAs that will each file 118 records annually for a total of 6,608 records (56 x 118 = 6,608). The estimated average number of burden hours per record is 0.50 hours resulting in an estimated total annual burden hours of 3,304 hours (6,608 x 0.5 = 3,304). **This burden is being reduced by 70 hours due to one less record keeper and decreased by 588 hours due to 21 fewer records per record keeper due to a Program change for a three year review cycle, for a total reduction of 658 hours.**
5. Sections 210.220(b)(11) and 210.19(b) require the SA to maintain records on the annual food preference survey of SFAs and prepare and forward to the DA information on schools eligible to receive USDA donated foods. FNS estimates that 56 SAs will each file 1 reports annually for an estimated number of responses of 56 (56 x 1 = 56). The estimated average number of burden hours per response is 3 resulting in an estimated total annual burden hours of 168 (56 x 3 = 168).
6. Section 210.20(b)(12) requires SAs to maintain records supplied by SFAs of food safety inspections obtained by schools. FNS estimates that 56 SAs will each file 354 reports annually for a total estimated number of responses of 19,824 (56 x 354 = 19,824). The estimated average number of burden hours per record is 0.25 resulting in estimated total annual burden hours of 4,956 (19,824 x 0.25 = 4,956). **This burden is being reduced by 252 hours due to 18 fewer records per record keeper due to fewer SFAs.**
7. Sections 210.20(b)(13) and 210.14(e) require SAs to maintain records of paid reimbursable lunch prices obtained from SFAs (FNS-828). FNS estimates that 56 SAs will each file 354 reports annually for a total estimated number of responses of 19,824 (56 x 354 = 19,824). The estimated average number of burden hours per record is 0.2 resulting in estimated total annual burden hours of 3,965 (19,824 x 0.2 = 3,965). **This burden is being reduced by 72 hours due to one less record keeper and reduced by 135 hours due to 12 fewer records per record keeper due to fewer SFAs, for a total reduction of 207 hours.**
8. Section 210.20(b)(15) requires SAs to maintain records to demonstrate compliance with the professional standards for State directors of school nutrition programs. FNS estimates that 56 State agencies will each file 1 record annually for a total estimated number records of 56 (56 X 1 = 56). The estimated average number of burden hours per record is 0.25 hours resulting in an estimated total annual burden hours of 14 (56 X .25 = 14). **This burden is being reduced by 14 hours due to 1 fewer record per record keeper.**

9. Section 210.18(h)(6) requires each SA to ensure that the LEA and SFA comply with the nutrition standards for all competitive food and maintain records documenting compliance. FNS estimates that 56 SAs will each maintain 118 records annually for a total estimated number of records of 6,608 ($56 \times 118 = 6,608$). The estimated average number of burden hours per record is 0.25 resulting in an estimated total annual burden hours of 1,652 ($6,608 \times 0.25 = 1,652$). **This burden is being reduced by 31 hours due to one less record keeper and reduced by 56 hours due to 4 fewer records per record keeper due to fewer SFAs, for a total reduction of 87 hours.**

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs) and LOCAL EDUCATION AGENCIES (LEAs)

1. Section 210.9(b)(19) requires SFAs to maintain names of children currently approved for free meals through direct certification with supporting documentation. FNS estimates that 19,822 SFAs will each file 4 reports annually for a total estimated number of records of 79,288 ($19,822 \times 4 = 79,288$). The estimated average number of burden hours per record is 0.65 resulting in an estimated total annual burden hours of 51,537 ($79,288 \times 0.65 = 51,537$). **This burden is being reduced by 2,590 hours due to 1,036 fewer SFAs and increased by 1,982 hours due to a slight increase in burden hours per record, for a net reduction of 608 hours.**
2. Section 210.11(b)(2) requires LEAs and SFAs to be responsible for maintaining records documenting compliance with the nutrition standards for all competitive food available for sale to students. FNS estimates that 19,822 SFAs will each file 1 record annually for a total estimated number of records of 19,822 ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per record is 20 resulting in an estimated total annual burden hours of 396,440 ($19,822 \times 20 = 396,440$). **This burden is being reduced by 20,720 hours due to 1,036 fewer SFAs.**
3. Sections 210.15(b)(1) and 210.8(a) require SFAs to maintain documentation of participation data by school, each month's Claim for Reimbursement, and all data used in the claims review process. FNS estimates that 19,822 SFAs will each file 10 records annually for a total estimated number of records of 198,220 ($19,822 \times 10 = 198,220$). The estimated average number of burden hours per record is 5 resulting in an estimated total annual burden hours of 991,100 ($198,220 \times 5 = 991,100$). **This burden is being reduced by 10,360 hours due to 1,036 fewer SFAs and reduced by 1,084,340 hours due to reduced burden hours per record for an increased use of electronic systems, for a total burden reduction of 1,094,700 hours.**
4. Sections 210.15(b)(2) and 210.7(d)(2) require SFAs to maintain production and menu records and documentation to support performance-based cash assistance. FNS estimates that 19,822 SFAs will each file 1 record annually for a total estimated number of records of 19,822 ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per record is 0.25 resulting in an estimated total annual burden hours of 4,956 ($19,822 \times 0.25 = 4,956$). **This burden is being reduced by 777 hours due to 1,036 fewer SFAs and reduced by 9,911**

hours due to a reduction in records per record keeper, for a total reduction of 10,688 hours. This burden will be eliminated in the next renewal since the requirement will only be the record of the annual attestation which is already included as part of the application/agreement burden.

5. Sections 210.15(b)(4) and 210.9(b)(18&20) require SFAs to maintain currently approved and denied applications for free and reduced-priced meals. FNS estimates that 19,822 SFAs will each file 1 record annually for a total estimated number of records of 19,822 ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per record is 2.66 resulting in an estimated total annual burden hours of 52,727 ($19,822 \times 2.66 = 52,727$). **This burden is being reduced by 2,755 hours due to 1,036 fewer SFAs.**
6. Sections 210.15(b)(6) and 210.14(e) require SFAs to maintain records to document compliance with reporting lunch prices to the SA. FNS estimates that 19,822 SFAs will each file 1 reports annually for a total estimated number of records of 19,822 ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per record is 5 resulting in an estimated total annual burden hours of 99,110 ($19,822 \times 5 = 99,110$). **This burden is being reduced by 5,180 hours due to 1,036 fewer SFAs.**
7. Sections 210.15(b)(7) and 210.14(f) require SFAs to maintain records to document compliance with revenue from nonprogram foods. FNS estimates that 19,822 SFAs will each file 1 reports annually for a total estimated number of records of 19,822 ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per record is 10 resulting in an estimated total annual burden hours of 198,220 ($19,822 \times 10 = 198,220$). **This burden is being reduced by 10,360 hours due to 1,036 fewer SFAs.**
8. Sections 210.15(b)(8) and 210.30(g) require SFAs to maintain records to demonstrate compliance with the professional standards for school nutrition program directors, managers and personnel. FNS estimates that 19,822 SFAs will each file 1 reports annually for a total estimated number of records of 19,822 ($19,822 \times 1 = 19,822$). The estimated average number of burden hours per record is 0.25 resulting in an estimated total annual burden hours of 4,955 ($19,822 \times 0.25 = 4,955$). **This burden is being reduced by 260 hours due to 1036 fewer SFAs.**

AFFECTED PUBLIC: SCHOOLS

1. Section 210.10(m) requires schools to maintain written statements signed by a licensed physician of the need for substitutions recommending alternate foods unless otherwise exempted by FNS. FNS estimates that 30,400 schools that will each file 1 record annually for a total estimated number of records of 30,400 ($30,400 \times 1 = 30,400$). The estimated average number of burden hours per record is 0.08 resulting in an estimated total annual burden hours of 2,432 ($30,400 \times 0.08 = 2,432$). **This burden is being reduced by 5,708 hours due to only a percentage of schools having this occur.**

2. Section 210.11(b)(2) requires that organizations responsible for food service at various venues in schools maintain records. FNS estimates that 101,332 schools will each file 1 record annually for a total estimated number of records of 101,332 ($101,332 \times 1 = 101,332$). The estimated average number of burden hours per response is 0.5 resulting in estimated total annual burden hours of 50,666 ($101,332 \times 0.5 = 50,666$). **This burden is being decreased by 2,075 hours due to 415 fewer schools and decreased by 455,994 hours due to a correction reducing the number of burden hours per record, for a total reduction of 458,069 hours.**
3. Section 210.15(b)(1) requires SFAs or schools to maintain records of participation data by school in support of the Claim for Reimbursement. FNS estimates that 101,332 schools will each file 180 reports annually for a total estimated number of responses of 18,239,760 ($101,332 \times 180 = 18,239,760$). The estimated average number of burden hours per response is .15 resulting in estimated total annual burden hours of 2,735,964 ($18,239,760 \times 0.15 = 2,735,964$). **Some of this burden is already accounted for in the SFA burden and some duplication is being removed in this revision. This burden is being decreased by 1,494 hours due to 415 fewer schools and decreased by 211,170 hours due to reducing the number of burden hours per record, for a total reduction of 212,664 hours.**
4. Sections 210.15(b)(2) (3) and 210.10(a)(3) require schools or SFAs to maintain production, menu, and the latest nutritional analysis records to show that meals meet requirements. FNS estimates that 101,332 schools will each file 180 reports annually for a total estimated number of responses of 18,239,760 ($101,332 \times 180 = 18,239,760$). The estimated average number of burden hours per response is 0.25 resulting in estimated total annual burden hours of 4,559,940 ($18,239,760 \times 0.25 = 4,559,940$). **This burden is being increased by 2,172,291 hours to correct the number of schools and is being decreased by 547,193 hours due to an adjustment in the burden hours per record, for a net increase of 1,625,098 hours.**
5. Sections 210.15(b)(5) and 210.13(b)&(c) require schools to maintain temperature records for food safety program and records from the most recent food safety inspection. FNS estimates that 101,332 schools will each file 120 reports annually for a total estimated number of responses of 12,159,840 ($101,332 \times 120 = 12,159,840$). The estimated average number of burden hours per response is 0.02 resulting in estimated total annual burden hours of 243,197 ($12,159,840 \times 0.02 = 243,197$). **This burden is being decreased by 1,525 hours to correct the number of schools and is being decreased by 121,416 hours to correct the number of records per record keeper, for a total reduction of 122,941 hours.**

Activities previously approved being removed from recordkeeping with this revision:

Section 220.7 requires schools to maintain SBP records for food safety program. FNS estimates that 81,517 schools will each file 180 reports annually for a total estimated number of responses of 14,673,060 ($81,517 \times 180 = 14,673,060$). The estimate average number of burden hours per response is 0.02 resulting in estimated total annual burden hours of 293,461 ($14,673,060 \times 0.02 = 293,461$). This burden is already accounted for since SBP schools are also NSLP schools and the duplication is being removed with this revision.

Section 210.13(b) requires schools to post the most recent food safety inspection and provide a copy upon request. FNS estimates that 101,747 schools will each file 2 reports annually for a total estimated number of responses of 203,494 ($101,180 \times 2 = 203,494$). The estimate average number of burden hours per response is .083 resulting in an estimated total annual burden hours of 16,890 ($101,332 \times .083 = 16,890$). This burden is being removed from RECORDKEEPING and added to REPORTING (the record keeping burden is already accounted for in this collection).

Section 210.15(b)(8) and 210.30(g) require that the SFA director (not each school) must document for all staff of school nutrition programs for compliance with the professional standards. FNS estimates that 101,747 schools will each file 1 report annually for a total estimated number of responses of 101,747 ($101,747 \times 1 = 101,747$). The estimated average number of burden hours per response is 0.25 resulting in an estimated total annual burden hours of 25,437 ($101,747 \times 0.25 = 25,747$). This burden is already accounted for in the SFA burden and the duplication is being removed.