

Estimate of the Information Collection Burden for the  
Summer Food Service Program (OMB #0584-0280)

This document explains the calculation of the information collection burden for the Summer Food Service Program under OMB #0584-0280 as submitted for the renewal of the existing regulation. A 60-day notice was published in the Federal Register on December 16, 2015 (Volume 80, Number 241, pages 78167-78169).

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES

1. Section 225.3(b) requires that each State agency must notify the Department by November 1 of each fiscal year regarding its intention to administer the Summer Food Service Program.

FNS estimates that each of the 53 State agencies will file 1 report annually for a total of 53 responses (53 X 1=53). The estimated average number of burden hours per response is 0.25 resulting in estimated total burden hours of 13.25 (53 X .25=13.25).

2. Section 225.4(a) requires that no later than February 15<sup>th</sup> of each year, each State agency shall submit to FNSRO a Program Management and Administration Plan for that fiscal year.

FNS estimates that each of the 53 State agencies will file 1 Management and Administration Plan annually for a total of 53 responses (53 X 1=53). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 53 (53 X 1= 53).

3. Section 225.8(d) (2) requires that State agencies must notify the appropriate FNSRO within 5 working days after they approve each private nonprofit organization to participate as a SFSP sponsor.

FNS estimates that each of the 53 State agencies will file 100 (100 is the average number of sponsors/State agency) reports annually for a total of 5,300 responses (53 X 100=5,300). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 5,300 (5,300 X 1=5,300). **The average number of responses per respondents increased from 90 to 100 (due to change in the number of total sponsors over the past three years. The number of burden hours per response remains same). This change results in an increase of 530 burden hours.**

4. Section 225.8(d)(1) requires that by May 1 of each year, State agencies must submit to the FNSRO a list of potential private nonprofit organization sponsors for each site, the first day of operation, and the estimated daily attendance.

FNS estimates that there will be audits of 53 State agencies and each will file 1 (average number of potential private nonprofit sponsors/State agency) report annually for a total of 53 responses ( $53 \times 1=53$ ). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 53 ( $53 \times 1=53$ ).

5. Section 225.9(b)(2) requires that the State agency prepare and submit a list of sponsors eligible to receive commodities and the daily number of eligible meals to be served by each sponsor not later than June 1 of each year.

FNS estimates that the 53 State agencies will each file 1 report annually for a total of 53 responses ( $53 \times 1=53$ ). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 53 ( $53 \times 1=53$ ).

6. Section 225.9(d)(4) requires that the State agency shall forward reimbursement within 45 days of receiving valid claims.

FNS estimates that of the 53 State agencies, 300 (100 sponsors/State agency X 3 reports) reports will be filed annually for a total of 15,900 ( $53 \times 300$ ) responses. The estimated average number of burden hours per response is 0.5 resulting in estimated total burden hours of 7,950 ( $15,900 \times 0.5=7,950$ ). **The number of responses per respondents increased from 270 to 300 (due to change in number of sponsors over the past three years). This change resulted in an increase of 795 burden hours.**

7. Section 225.12(a) requires that the State agency shall disallow any portion of a claim for reimbursement and recover any payment to a sponsor not properly payable.

FNS estimates that 53 State agencies will each file 9 (1% of the average number of sponsors/State agency) reports annually for a total of 477 ( $53 \times 9=477$ ). The estimated average number of burden hours per response is 4 resulting in estimated total burden hours of 1,908 ( $477 \times 4=1,908$ ).

8. Section 225.18(b)(2) requires that the State agency shall terminate a sponsor's participation in the program by written notice whenever it is determined by the State agency that the sponsor has failed to comply.

FNS estimates that 53 State agencies will each file 5 reports (average number of terminated sponsors per year) annually for a total of 265 ( $53 \times 5=265$ ). The

estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 265 (265 X 1=265).

- 9. Section 225.8(b) requires that each State agency shall submit to FNS a final report (FNS-418) on the SFSP operations for each month no more than 90 days following the last day of the month covered by the report.**

**FNS estimates that each of the 53 State agencies will file 3 reports annually for a total of 159 responses (53 X 3=159). The estimated average number of burden hours per response is 2 resulting in estimated total burden hours of 318 (159 X 2=318). This report is transferred to a different collection (0584-0594) and hence this burden is removed from this collection (reduction of 318 burden hours).**

#### AFFECTED PUBLIC: SPONSORS

1. Sections 225.6(c) (1), 225.6(c)(4), and 225.14(a) require that sponsors submit written applications to State agencies for participation in the SFSP.

**FNS estimates that there are 5,317 sponsors that will each file 1 report annually for a total of 5,317 responses (5,317 X 1=5,317). The estimated average number of burden hours per response is 3.40 resulting in estimated total burden hours of 18,077(5,317 X 3.40=18,077). The number of sponsors increased from 4,754 to 5,317 and the amount of time to complete the task is increased from 3.30 to 3.40. These changes result in an increase of 2,390 burden hours.**

2. Section 225.6(c) (2) and ( c)(3) requires that sponsors submit site information for each site where a food service operation is proposed.

**FNS estimates that there are 5,317 sponsors that will each file 1 report annually for a total of 5,317 responses (5,317 X 1=5,317). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 5,317 (5,317 X 1= 5,317). The numbers of sponsors increased from 4,754 to 5,317. This change resulted in an increase of 558 hours. Note that 225.6(c)(3) has been combined with 225.6( c)(2).**

3. Sections 225.6(e) and 225.14 (c )(7)require that sponsors approved for participation in SFSP enter into written agreements with State agencies to operate the program in accordance with regulatory requirements.

**FNS estimates that there are 531 sponsors (10% of the 5,317 sponsors/State agency) that will each file 1 report annually for a total of 531 responses (531 X 1 = 531). The estimated average number of burden hours per response is .12 resulting in estimated total burden hours of 65 (531 X .12=65). The number of sponsors increased from 475 to 531. This change resulted in an increase of 7 burden hours.**

4. Section 225.6(h) (2) (iii) requires that sponsors provide food service management companies with a list of approved sites.

**FNS estimates that approximately 1,754 sponsors will contract with food service management companies and will each file 1 report annually for a total of 1,754 (1,754 X 1=1,754). The estimated average number of burden hours per response is .5 resulting in estimated total burden hours of 877 (1,754 X .5=877). The number of sponsors increased from 4,754 to 5,317, which in turn increased the sponsors contracting with the food service management companies from 1,426 to 1,754. This change resulted in an increase of 164 hours.**

5. Section 225.6(h) (3) requires that sponsors submit requests to State agencies for exceptions to unitizing requirements for certain components of a meal.

**FNS estimates that 1% of sponsors that have contracts with food service management companies will submit 1 of these requests. Since FNS estimates that 531 sponsors hire food service management companies, 1% of that would be 53. 53 would file 1 report annually for a total of 53 (53 X 1=53). The estimated average number of burden hours per response is .5 resulting in estimated total burden hours of 26.5 (53 X .5=26.5). The number of sponsors for this task increased from 47 to 53 and this change resulted in an increase of approximately 3 hours.**

6. Sections 225.6(h) (5) and 225.6(h) (2) require that sponsors submit to State agencies copies of the contracts with food service management companies, the bids received, and the reasons why the food service management company was chosen.

**FNS estimates that there are approximately 1,754 food service management companies doing business in the SFSP and that sponsors submit 1 report annually for a total of 1,754 annual responses (1,754 X 1 = 1,754). The estimated average number of burden hours per response is 20 resulting in estimated total burden hours of 35,080 (1,754 X 20 = 35,080). The number of sponsors increased from 1,426 to 1,754 (this requirement applies to less than third of sponsors) and this change resulted in an increase of 6,560 hours.**

7. Section 225.15(a) requires sponsors to submit to the State agency a copy of their letter advising the appropriate health department of their intention to provide a food service during a specific period at specific sites.

**FNS estimates that approximately 5,317 sponsors will submit a copy of their letter to the health department and will each file one report annually for a total of 5,317 (5,317 X 1=5,317). The estimated average number of burden hours per response is .25 resulting in estimated total burden hours of 1,329 (5,317**

**X .25=1,329). This requirement was missed in the last renewal and hence was added with this renewal.**

AFFECTED PUBLIC: CAMPS AND OTHER SITES

1. Section 225.6(c) (5) requires that camps submit copies of hearing procedures.

**FNS estimates that 662 camps participate in the SFSP. Each camp will file 1 report annually for a total of 662 responses (662 X 1=662). The estimated average number of burden hours per response is .25 resulting in estimated total burden hours of 165 (662 X .25=165). The number of camps and other sites decreased from 791 to 662. This change resulted in decrease of 32.25 burden hours.**

AFFECTED PUBLIC: HOUSEHOLDS

1. Section 225.15(f) requires households to read instructions, complete free meal applications, and return to camps and sites.

FNS estimates that 100,589 households participate in the SFSP. Each household will file 1 report annually for a total of 100,589 responses (100,589 X 1=100,589). The estimated average number of burden hours per response is .5 resulting in estimated total burden hours of 50,295 (100,589 X .5=50,295).

2. Section 225.15(j) requires households to provide written consent for sponsors to use or disclose information.

FNS estimates that 100,589 households participate in the SFSP. Each household will file 1 report annually for a total of 100,589 responses (100,589 X 1=100,589). The estimated average number of burden hours per response is .25 resulting in estimated total burden hours of 25,147 (100,589 X .25=25,147).

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES

- 1 Section 225.8(a), 225.7(d) (5) and **225.13(d)** requires state agencies to maintain accurate accounting records for reviews, appeals and accounting.

FNS estimates that 53 state agencies will maintain 39 records for reviews resulting in 2,067 total records (53x39). The estimated average number of burden hours per each record is 0.08 hours resulting in 165.36 hours (2067x.08). Similarly FNS estimates

that 53 state agencies will each maintain 2 appeal records resulting in 106 records (53x2) and estimated average number of burden hours per each record is 0.08 resulting in 8.480 hours (106x0.08). **For accounting records 53 state agencies will each maintain 100 records resulting in 5,300 (53x100) and estimated average time per each record is 0.08 hours resulting in estimated total burden hours of 424 (5,300x0.08). This change is due to increase in number of sponsors from 4,754 to 5,317 (which increased the records from 90 to 100 per respondent) and this resulted in an increase of 42.4 burden hours.**

AFFECTED PUBLIC: SPONSORS

- 1 Sections 225.15(c), 225.15(a), and 225.9(g) require sponsors to maintain records that justify all costs and meals claimed.

FNS estimates that 5,317 sponsors will each maintain 1 record for a total of 5,317 records. The estimated average burden for each record is 0.08 hours resulting in a total of 425 burden hours (5,317 x 0.08). This change is a result of an increase in sponsors from 4,754 to 5,317 and this resulted in an increase of 45.04 burden hours.

- 2 Section 225.16(b) requires camps and sponsors to maintain copies of the documentation establishing the eligibility of child receiving meals and all other meal service requirement information.

FNS estimates that 5,317 sponsors will each maintain 100 records resulting in 531,700 (5,317x100) records. The estimated average burden hours for each record are 0.08 hours resulting in a total of 42,536 hours (531,700x0.08). This change is a result of an increase in sponsors from 4,754 to 5,317, which in turn increased the number records per respondent from 90 to 100. These changes resulted in an increase of 8,307 burden hours.

AFFECTED PUBLIC: CAMPS AND OTHER SITES

1. Section 225.6(c) (5) (xii) requires that camps maintain records of hearing for three years.

FNS estimates that 662 camps participate in the SFSP. Each camp will maintain 1 record of hearing annually for a total of 662 responses (662 X 1=662). The estimated average number of burden hours per response is .3 resulting in estimated total burden hours of 199 (662 X .3=199). This change is a result of a decrease in number of camps from 791 to 662 and this resulted in a decrease of 38 burden hours.

## PUBLIC DISCLOSURE REQUIREMENTS

### AFFECTED PUBLIC: STATE AGENCIES

There are no burden hours associated with public disclosure requirements for the state agencies.

### AFFECTED PUBLIC: SPONSORS

1. Section 225.15(e) requires sponsors to annually announce in the media serving the area from which it draws its attendance the availability of free meals.

**FNS estimates that approximately 5,317 sponsors will make an announcement in the media once a year for a total of 5,317 (5,317 X 1=5,317). The estimated average number of burden hours per response is .25 resulting in estimated total burden hours of 1,329 (5,317 X .25=1,329). This requirement was missed in last renewal and hence was added with this renewal.**

### AFFECTED PUBLIC: CAMPS AND OTHER SITES

There are no burden hours associated with public disclosure requirements for the camps and other sites.

### AFFECTED PUBLIC: HOUSEHOLDS

There are no burden hours associated with public disclosure requirements for the households.