

REGIONAL OFFICE ADMINISTERED PROGRAM (ROAP)
CHILD NUTRITION PAYMENT CENTER
(FOR THE NATIONAL SCHOOL LUNCH, SCHOOL BREAKFAST, AND SPECIAL
MILK PROGRAMS)
OMB CONTROL NUMBER 0584-0284
REVISION OF A CURRENTLY APPROVED COLLECTION

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Attachments

A. Child Nutrition Payment Center Screen Prints

A.1 School Lunch/Breakfast/Snack Claim for Reimbursement

A.2 Milk Claim for Reimbursement

A.3 National School Lunch, Breakfast, and Commodity School Program Application and
National School Lunch, Breakfast and Commodity School Program Site Data

A.4 Special Milk Program Application, Agreement Policy Statement and Special Milk
Program Site Data

B. Public Comment

A. JUSTIFICATION

1. 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 5 of the Child Nutrition Act of 1966 [U.S.C. 1774] specifies that if the Secretary of Agriculture is administering (in whole or in part) any program authorized under this Act, the State in which the Secretary is administering the program may, upon request to the Secretary, assume administration of that program. If a State educational agency is not permitted by law to disburse the funds paid to it under this Act to any of the nonpublic schools in the State, the Secretary shall disburse the funds directly to such schools within the State for the same purposes and subject to the same conditions as are authorized or required with respect to the disbursements to public schools within the State by the State educational agency.

In States where the FNS Regional Office administers the Programs as a Regional Office Administered Program (ROAP), school food authorities (SFAs) or local institutions must submit the monthly claim for reimbursement data to the Regional Office for processing to receive reimbursement. The recordkeeping burden is maintained in the information

collections for each of the Programs; i.e. 7 CFR Part 210, National School Lunch Program (OMB control #0584-0006), 7 CFR Part 220, School Breakfast Program (OMB control #0584-0012), and 7 CFR Part 215, Special Milk Program for Children (OMB control #0584-0005). All of the reporting and recordkeeping requirements are currently approved by the Office of Management and Budget (OMB) and are in force.

2. Purpose and Use of the Information

Indicate how, by whom, 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.

This information collection is required to administer and operate the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Special Milk Program (SMP) in accordance with the National School Lunch Act for the States of Colorado and Virginia that have some schools and institutions whose Programs are administered directly by the associated USDA FNS Regional Office (as part of a ROAP) instead of the designated State agency. It is mandatory for the school food authorities and other institutions to provide the application and claim for reimbursement information requested by this collection. The information collected is necessary to enable FNS to determine whether the school food authority or institution is eligible to participate and receive Program reimbursement of

meals/milk served to eligible children. The data collected includes the submission of an annual application and monthly claims for reimbursement of numbers of meals/milk served to children.

As part of a ROAP, these SFAs and institutions complete a Federal Claim for Reimbursement to receive reimbursement for meals and milk served to children; the forms previously used were forms FNS-806A School Lunch/Breakfast/Snack Claim for Reimbursement and FNS-806B Milk Claim for Reimbursement. These SFAs and institutions also complete a Federal application to participate in these Programs; the forms previously used were forms FNS-66 Application for Participation National School Lunch, School Breakfast, Special Milk, and Commodity School Programs, FNS-66A National School Lunch, Breakfast, and Commodity School Program Application and National School Lunch, Breakfast, Special Milk, and Commodity School Program Site Data, and FNS-66B Special Milk Program Application, Agreement Policy Statement and Special Milk Program Site Data. These forms were previously part of other information collections. FNS-66 and 66A were part of OMB control #0584-0006, titled 7 CFR Part 210 National School Lunch Program, expiration date April 30, 2016, while FNS-66B was part of OMB control #0584-0005, titled 7 CFR Part 215 Special Milk Program for Children, expiration date January 31, 2019). During the current renewal of 0584-0006, it was determined that FNS-66 had not been used since the collection was last renewed in 2013, so this form was removed from the collection. The information that was

previously collected on the other four forms is currently entered directly into one computerized web application and payment system (submitted electronically via the Internet) referred to as the Child Nutrition Payments Center (currently administered by the FNS Mid-Atlantic Regional Office). However, the State of Virginia will no longer be using a FNS ROAP as of July 1, 2016. Screen prints for these forms are provided in Attachments A.1 through A.4.

The Child Nutrition (CN) Payment Center is the secure online portal operated by FNS for use by a limited number of institutions and SFAs within Colorado, Virginia, and U.S. Department of Defense school installations (however, they are not included in the burden since they are a Federal entity). Through this portal, these SFAs and institutions can submit Program applications and claims for meal reimbursement.

With the renewal of this information collection, the two FNS forms (FNS-806A and FNS-806B) that were approved under this collection are now officially being removed and replaced by the electronic system that currently exists. In addition, the application information originally collected through the three paper FNS forms (FNS-66, FNS-66A, and FNS-66B) is being moved into this collection since the information previously collected through these forms is now collected through the electronic ROAP system (the paper versions of FNS-66, FNS-66A, and FNS-66B have been officially removed from OMB control #0584-0006 and

0584-0005). Attachments A.1 through A.4 show the data elements captured through the ROAP screens. The reporting requirements for the application information are being incorporated into this information collection since it is part of the ROAP system. FNS would not be able to properly reimburse the institutions without this information collection.

3. Use of the Information Technology and Burden Reduction

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.

The Food and Nutrition Service is committed to complying with the E-Government Act of 2002 to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. State agencies collect participation and meal count data from SFAs and institutions via their own electronic systems; however, for Programs which are administered directly by the associated USDA FNS Regional Office as a ROAP, FNS utilizes a web-based electronic Child Nutrition Payment Center system to obtain application and claim for reimbursement data. This allows a school food authority or institution to directly submit application and meal count information to the FNS ROAP via a secure Internet connection.

The system operates with edit checks to automatically enforce Federal rules and regulations governing participation and reimbursements in the Child Nutrition Programs. FNS estimates that 100% of the information submitted in this collection is collected electronically (via the Child Nutrition Payment Center).

4. Efforts to Identify Duplication

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in question 2.

There is no similar information data collection available. Every effort has been made to avoid duplication. The Child Nutrition Payment Center system used by the ROAP is administered solely by FNS.

5. Impacts on Small Businesses or Other Small Entities

If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Information being requested or required has been held to the minimum required for the intended use. School Food Authorities, Local Educational Agencies, and schools generally meet the definition of a “small governmental jurisdiction” which meets the definition of “small entity” in the Regulatory Flexibility Act. FNS estimates that 100% of respondents

are small entities.

6. Consequences of Collecting the Information Less Frequently

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.

The information is collected for the purpose of administering ongoing Programs. Applications can be accepted and agreements executed at any time, although typically this occurs shortly before the beginning of each school year. SFAs and institutions submit claims for reimbursement for every month they operate these Programs. If the data is collected less frequently, FNS would not be able to properly reimburse Programs and SFAs and institutions would not receive the monthly reimbursement they earned.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Explain any special circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5:

- **requiring respondents to report information to the agency more often than quarterly;**

Program regulations require that SFAs and institutions are reimbursed monthly; therefore, SFAs and institutions are required to submit data monthly on the actual number of meals and

milk served to ensure Program accountability and receive timely reimbursement.

- **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 other special circumstances. The collection of information is conducted in a

manner consistent with the guidelines in 5 CFR 1320.5.

8. Comments to the Federal Register Notice and Efforts for Consultation

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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. Specifically address comments received on cost and hour burden.

A 60-day notice was published in the Federal Register on January 4, 2016, Volume 81, No. 1 on pages 61 - 62. The public comment period ended on March 4, 2016. One comment was received and reviewed in response to the agency's notice and was determined to be unrelated to this information collection (Attachment B).

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

FNS consults with its Regional Offices regarding any proposed changes as the result of legislative, regulatory or administrative changes. For the ROAP, the Regional Office is in

direct contact with SFAs and institutions and able to obtain feedback on FNS processes and procedures for this information collection.

9. Explain any decision to provide any payment or gift to respondents

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

No payment or gift is provided to respondents.

10. Assurances of Confidentiality Provided to Respondents

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy

The Department complies with the Privacy Act of 1974. No confidential information is associated with this information collection.

11. Justification for any questions of a sensitive nature

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 .

There are no questions of a sensitive nature included in this information collection.

12. Estimates of the Hour Burden of the Collection of Information

A. Provide estimates of the hour burden of the collection of information. 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

This is a revision of a currently approved collection. There are 60 SFAs and institutions that will operate the NSLP, SBP, and/or SMP under the administration of a FNS Regional Office and will submit an annual application and monthly claim for reimbursement report via the Child Nutrition Payment Center with a frequency of 11 responses (10 monthly claims for reimbursement plus one annual application) with an estimated time of 0.5 hours per response. A summary of the burden appears below:

**ESTIMATED ANNUAL REPORTING BURDEN FOR
OMB CONTROL #0584-0284, CHILD NUTRITION PAYMENT CENTER –
REVISION OF A CURRENTLY APPROVED COLLECTION**

Affected Public	Program	Number of Respondents	Frequency of Response	Average Annual Responses	Average Burden per Response	Annual Burden Hours
School Food Authority	NSLP/SBP	40	11	440	.5	220
School Food Authority	SMP	20	11	220	.5	110
Total Burden		60	11	660	.5	330

of information, identifying and using appropriate wage rate categories.

The estimate of respondent cost utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2014 National Occupational and Wage Statistics, Occupational Group (25-0000) (<http://www.bls.gov/oes/current/oes250000.htm>). The mean hourly wage (for education-related occupations) for functions performed by local education agency staff is estimated at \$25.10 per staff hour.

TOTAL COST TO PUBLIC = 330 hours X \$25.10 per hour = \$8,283.

13. Estimate of Other Total Annual Cost Burden

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.

Annual operation and maintenance costs for this collection^{14/15} of information exist in an annual contract with the National Information Technology Center (NITC) for \$10,871.

14. Provide estimates of annualized cost to the Federal government

Provide estimates of annualized cost to the Federal government. 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.

It is estimated that Federal FNS employees receiving an average General Schedule (GS) grade 12 step 10 wage based on the 2016 New York-Newark, NY-NJ-CT-PA (ROAP Location: Robbinsville, NJ) locality area wage chart take approximately 208 hours to maintain the system and process data received from SFAs and institutions:

$\$49.98 \times 208 \text{ hours} = \$ 10,396$ (estimated annualized cost to the Federal government).

15. Explanation of Program Changes of Adjustments

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

This is a revision of a currently approved collection. The information collection is currently approved with 1,260 burden hours and 2,520 responses. For this revision, the previously approved burden of 1,260 hours and 2,520 responses is decreased to 330 burden

hours and 660 responses (causing a decrease of 930 burden hours and 1,860 responses from the OMB information collection inventory). This adjustment is a result of fewer ROAPs (Colorado is now the only state using the ROAP system), which decreased the number of respondents from 210 to 60, and an adjustment to correct the frequency of the responses from 12 to 11.

In addition, the paper versions of FNS-806A and FNS-806B are being removed from this collection since the data is now directly entered into the ROAP/Child Nutrition Payment Center. The application information originally collected through FNS-66, FNS-66A, and FNS-66B is now officially being included in this collection. These changes do not affect the burden because the estimated completion times for FNS-806A and FNS-806B are the same for the paper and electronic submissions and also because the ROAP/Child Nutrition Payment Center has always been used to collect the information from all of these five forms. FNS is revising this information collection to correctly reflect this activity.

16. Plans for tabulation, and publication and project time schedule

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

There are no plans to tabulate or publish any information in connection with this information collection.

17. Displaying the OMB Approval Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to the Certification Statement Identified in Item 19

Explain each exception to the certification statement identified in Item 19

"Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.