

**SUPPORTING STATEMENT**

**OMB CONTROL NUMBER 0584-0026**

**7 CFR PART 245 - DETERMINING ELIGIBILITY FOR FREE AND REDUCED PRICE**

**MEALS AND FREE MILK IN SCHOOLS**

**REVISION OF A CURRENTLY APPROVED COLLECTION**

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## **A. JUSTIFICATION**

### **Background:**

Since the previous renewal of this information collection in April 2013, FNS published final rules (such as RIN 0584-AE17 Independent Review of Applications) which revised the language in 7 CFR Part 245 for some (but not all) of the regulations to refer to the “local educational agency” (LEA) instead of the “school food authority” (SFA). Due to these revisions, this renewal now refers to LEAs in many instances where SFAs were referred to in the previous renewal. In the majority of situations, the SFAs and LEAs are the same entity. For this renewal, none of the SFA/LEA terminology in the 7 CFR Part 245 citations is being changed. However, FNS is preparing the Community Eligibility Final Rule which will further change the terminology in Part 245 and permit FNS to use these terms interchangeably.

### **A1. 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. The Richard B. Russell National School Lunch Act (NSLA), as amended, authorizes the National School Lunch Program (NSLP). Section 9, Paragraph 9(b) of the NSLA provides that the income guidelines for determining eligibility for free school meals must be 130 percent, and reduced price school meals must be 185 percent, of the applicable family size income levels contained in the non-farm income poverty guidelines prescribed by the Office of Management and Budget, as adjusted annually. The Code of Federal Regulations (CFR), Title 7 CFR Part 245, Determining Eligibility for Free and Reduced-

Price Meals and Free Milk in Schools, sets forth policies and procedures for implementing these provisions. These federal regulations require schools operating the NSLP to determine children's eligibility for free and reduced price meals on the basis of each child's household income and size, and to establish operating procedures that will prevent physical segregation, or other discrimination against, or overt identification of children unable to pay the full price for meals or milk.

Section 104 of the Child Nutrition and WIC Reauthorization Act of 2004 added section 9(b)(4) to the NSLA (42 U.S.C. 1758(b)(4)) to require school food authorities to directly certify, without further application, any child who is a member of a household receiving Supplemental Nutrition Assistance Program (SNAP) benefits. Under the direct certification process, a local educational agency obtains documentation of a child's receipt of SNAP benefits from the State or local SNAP office. The intent is to improve school meal program access for low-income children, reduce paperwork for households and program administrators, and improve the integrity of the free and reduced price meal certification process.

## **A2. 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.**

The purpose of this information collection is to comply with the federal requirements for State agencies and local educational agencies (LEAs) / school food authorities (SFAs). These federal requirements affect eligibility under the school lunch and breakfast programs, the Special Milk

Program (SMP) and are also applicable to the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) primarily when individual eligibility must be established. LEAs/SFAs are required to annually determine the eligibility of children for free and reduced price meals, and for free milk, and assure that there is no physical segregation of, or other discrimination against, or overt identification of children unable to pay the full price for meals or milk.

There are different methods for establishing eligibility for free and reduced price meals and for free milk. The original method was for a household to submit a meal benefit application. The NSLA requires that LEAs verify a required percentage of meal applications for accuracy of the eligibility determinations. LEAs are also required to use a streamlined method to directly certify children from households receiving benefits from SNAP for free school meals. The direct certification process is required at least three times a year and it enhances access to school meals by low income children, decreases duplicative paperwork for households, decreases administrative costs of processing and reviewing applications, and improves program integrity. LEAs electing the community eligibility provision must submit to the State agency documentation that the LEA or school meets the minimum identified student percentage threshold the year prior to the 1<sup>st</sup> year of the cycle (i.e. students directly certified for free school meals without the use of a household application divided by enrolled students, multiplied by 100). This provision decreases administrative costs of processing and reviewing applications. The State agency is required to review and confirm the eligibility documentation submitted by the LEA prior to approval to participate in the provision. The LEA serves all meals at no charge to all enrolled students for one or more 4-year cycles. Any costs exceeding reimbursement must

be covered with non-Federal funds. Reimbursement for breakfasts and lunches is based on free and paid claiming percentages applied to the total number of reimbursable lunches and breakfasts served, respectively, each month.

State agencies are required to report program data to FNS using FNS forms. The reporting burden for some of these reporting forms is associated with the information collection for the Food Programs Reporting System (FPRS), OMB Control #0584-0594, expiration date 6/30/2017 and is not duplicated in this information collection. However, the recordkeeping burden is still maintained in this collection. The FNS forms that are collected via FPRS which are associated with this information collection are FNS-742 (School Food Authority Verification Collection Report) and FNS-874 (Local Educational Agency Second Review of Applications Report) (Attachments E and F).

FNS also submits an annual direct certification status report to Congress. The burden narrative provides further details concerning the types of burden covered in this collection and the groups from whom the information is being collected (Appendix A). The Eligibility Manual for School Meals provides further information concerning how the information is collected from the various groups and what information is being collected (Appendix G).

### **A3. 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.**

FNS 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. All State agencies participating in the NSLP transfer their information electronically through the Verification Data Reporting System (<http://www.fns.usda.gov/nslp>). In addition, each State agency maintains its own website to communicate electronically with SFAs in their state. However, most of the information collection responses are either to or from households for which information collection is not electronic. Therefore, out of 16,519,456 responses, FNS estimates that one percent (165,195 responses) will be submitted electronically.

**A4. 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 purpose described in item 2.**

Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State agency reporting requirements, and special studies by other government and private agencies. FNS solely monitors and administers the Child Nutrition Programs. This information collection obtains eligibility information for free school meals directly from another agency (SNAP, Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), and foster care agencies) to reduce duplicative paperwork for households



who have already established their need for assistance to certain programs which serve low-income children and will streamline the free meal application and certification process for schools.

**A5. 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-I), describe any methods used to minimize burden.**

Information being requested or required has been held to the minimum required for the intended use. State agencies are not considered small entities as state populations exceed the 50,000 threshold for a small government jurisdiction. However, 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. Out of the 19,822 School Food Authorities and Local Educational Agencies, FNS estimates that 98% of them (approximately 19,426) are small entities. Out of total 5,409,878 respondents for the entire collection, FNS estimates that less than 1% are small entities.

**A6. 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.**

Eligibility information is collected annually from households and some of these household meal applications are verified annually for the purpose of administering an on-going program. Another

method is the direct certification process which is required at least three times a year, although more frequent direct certification efforts are permissible and encouraged. If this information is collected less frequently, duplicate paperwork for households could occur and the potential to facilitate participation of children in the school meals programs would be unavailable. In addition, FNS would not be able to monitor the program data submitted by the LEAs/SFAs and State agencies.

#### **A7. 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;**
- **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 of 5 CFR 1320.5.

#### **A8. 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, 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 60-day Federal Register Notice was published January 13, 2016, in the Federal Register (Vol. 81, No. 8, p. 1602-1603). The comment period for the information collection ended on March 14, 2016. Four comments were received. One comment specified that instead of a case number, that a card number be allowed to qualify; it also commented that direct certification is not available for the Summer Food Service Program (SFSP), but that it would reduce burden if it was allowed. FNS response: Neither the current regulations nor statutory authority exists to extend direct certification to the SFSP. One comment recommended linking the form electronically to categorically eligible Programs and that the income eligibility form be electronic. Another comment also specified that direct certification is only available to school

food authorities and not available to the Child and Adult Care Food Program (CACFP) or the SFSP and that it would reduce burden; it also suggested making the income eligibility form available electronically. FNS response: There are some schools that already utilize an electronic form which is allowed. One comment was incoherent. Refer to Appendix C for details.

**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.**

When FNS revises an information collection package, the information is posted on the Agency Web page for review and comment by Regional Offices, State agencies, community groups, and the public. FNS also consults with Regional Offices regarding any proposed changes as the result of legislative, regulatory or administrative changes. Regional offices are in contact with State agencies which provide feedback on processes and procedures for the information collection, regarding reporting and recordkeeping requirements. In addition, FNS publishes revisions to its forms in the Federal Register and requests comments.

**A9. Explain any decision to provide any payment or gift to respondents.**

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

No payment or gift was provided to respondents.

**A10. 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. Regarding the confidential nature of direct certification information, the regulations in 7 CFR 245.6(b)(9) specify that “Information about children or their households obtained through the direct certification process must be kept confidential and is subject to the limitations on disclosure of information in section 9 of the Richard B. Russell National School Lunch Act, 42 U.S.C. 1758.” 7 CFR 245.6(f) through (k) specifies regulatory requirements governing disclosure of children's program eligibility information obtained through the free and reduced price meal or free milk eligibility process.

The penalties for unauthorized disclosure or misuse of information is specified in 7 CFR 245.6(k): “In accordance with section 9(b)(6)(C) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1758(b)(6)(C)), any individual who publishes, divulges, discloses or makes known in any manner, or to any extent not authorized by statute or this section, any information obtained under this section will be fined not more than \$1,000 or imprisoned for up to 1 year, or both.”

**A11. 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 clearance package.

**A12. Estimates of the Hour Burden of the Collection of Information.**

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

- A. 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 information collection. As a result of program adjustments, this revision will remove 4,034 hours of burden from the current inventory. The following tables and Appendix C reflect the estimated burden associated with this information collection for each type of respondent. The respondents for this information collection includes: 54 State agencies, 19,822 LEAs/SFAs, and 5,390,000 households.

Affected Public: State Agencies, LEAs/SFAs, and Individuals/Households

Estimated Number of Respondents: 5,409, 876

Estimated Number of Responses per Respondent: 3.054

Estimated Total Annual Responses: 16,519,454

Estimated Hours per Response: 0.057

Estimate Total Annual Burden Hours: 945,743

Current Approved OMB Burden Hours: 949,777

Difference Requested (hours): -4,034

**ESTIMATED ANNUAL BURDEN FOR 0584-0026,**

**DETERMINING ELIGIBILITY FOR FREE AND REDUCED PRICE FREE MEALS, 7 CFR PART 245**

**REVISION OF A CURRENTLY APPROVED COLLECTION**

Burden Activities	Section	Estimated Number of Respondents	Frequency of Response	Average Annual Responses	Average Burden per Response	Annual Burden Hours	Current OMB approved Burden	Due to Program Adjustment
<b>Reporting (State Agencies)</b>								
<b>Puerto Rico and Virgin Islands SAs conduct triennial survey to develop factor for withdrawal of funds from Letter of Credit. (REMOVED)</b>	245.4(c)	2	0.33	0.66	70	-	46	(46)
<b>Puerto Rico and Virgin Islands SAs submit survey results and the factor for fund withdrawal to FNS for approval. (REMOVED)</b>	245.4(d)	2	0.33	0.66	5	-	3	(3)
SAs and LEAs must obtain written consent from parent/ guardian for uses not specified in the regulation.	245.6(i)	54	1	54	0.25	13.5	14	(0.5)
SAs enter into written agreement with the agency receiving children's free and reduced price eligibility information.	245.6(j)	54	1	54	0.25	13.5	14	(0.5)
SAs notify FNS if State's TANF is no longer eligible.	245.12(g)	54	1	54	0.10	5.4	5.6	-
SAs submit to FNS upon request the number of schools on Provision 1, Provision 2 or Provision 3 and extensions.	245.12 (h) (4)	43	1	43	1.5	64.5	64.5	-
SAs that fail to meet the direct certification benchmark must develop and submit a <i>Continuous Improvement Plan</i>	245.13(e)	18	1	18	3	54	54	-
<b>State Agency Reporting Burden Total</b>		<b>54</b>	<b>4.02</b>	<b>223</b>	<b>0.67</b>	<b>151</b>	<b>201</b>	<b>(50)</b>
<b>Reporting (Local Educational Agencies (LEAs)/School Food Authorities (SFAs))</b>								
<b>LEAs notify households of approval of meal benefit applications.</b>	245.6 (c) (6)(i)	<b>19,600</b>	<b>275</b>	<b>5,390,000</b>	<b>0.02</b>	<b>107,800</b>	<b>125,148</b>	<b>(17,348)</b>
<b>LEAs must notify households in writing that children are eligible for free meals based on direct certification and that no application is required.</b>	245.6 (c) (6)(ii)	<b>19,600</b>	<b>260</b>	<b>5,096,000</b>	<b>0.02</b>	<b>101,920</b>	<b>62,574</b>	<b>39,346</b>
<b>LEAs notify each household in writing of denied benefits.</b>	245.6 (c) (7)	<b>19,600</b>	<b>10</b>	<b>196,000</b>	<b>0.02</b>	<b>3,920</b>	<b>7,092</b>	<b>(3,172)</b>
<b>SFA must have a written agreement with</b>	245.6 (j)	<b>2,000</b>	<b>1</b>	<b>2,000</b>	<b>0.5</b>	<b>1,000</b>	<b>3,462</b>	<b>(2,462)</b>



the agency receiving children's free and reduced price eligibility information.								
LEAs notify households of selection for verification.	245.6a(f)	19,600	8	156,800	0.25	39,200	62,574	(23,374)
LEAs must provide households that failed to verify eligibility with 10 day notice.	245.6a(j)	19,600	2	39,200	0.1	3,920	6,883	(2,963)
SFAs with schools under Provisions 1, 2, or 3 must identify those schools in its free and reduced price policy statement and certify their eligibility for the first year of operation.	245.9(f)	1,160	1	1,160	0.25	290	273	17
SFAs with schools under Provision 2 or Provision 3 submit to FNS upon request all data and documentation used in granting extensions.	245.9(h)	1,160	0.25	290	0.25	73	273	(200)
LEAs submit to SA for approval a free and reduced price policy statement.	245.10(a)	19,600	1	19,600	0.08	1,568	1,572	(4)
<b>Local Educational Authority / School Food Authority Reporting Burden Total</b>		<b>19,600</b>	<b>556.176</b>	<b>10,901,050</b>	<b>0.024</b>	<b>259,691</b>	<b>269,851</b>	<b>(10,160)</b>
<b>Reporting (Households)</b>								
Households complete meal benefit application form.	7 CFR 245.6(a)	5,390,000	1	5,390,000	0.11	592,900	578,343	14,557
Households submit written evidence to the LEA for verification.	7 CFR 245.6a (a) (7)(i)	160,000	1	160,000	0.5	80,000	95,000	(15,000)
Households cooperate by providing collateral contacts to the LEA for verification of eligibility	7 CFR 245.6a (a) (7)(ii)	1,000	1	1,000	.1	100	317	(217)
<b>Household Reporting Burden Total</b>		<b>5,390,000</b>	<b>1.03</b>	<b>5,551,000</b>	<b>0.12</b>	<b>673,000</b>	<b>673,660</b>	<b>(660)</b>
<b>Total Reporting Burden for Part 245 with Revisions</b>		<b>5,409,656</b>	<b>3.04</b>	<b>16,452,275</b>	<b>0.06</b>	<b>932,842</b>	<b>943,712</b>	<b>(10,870)</b>

**Reporting Summary:**

Affected Public	Form Number	Estimated No. Respondents	Estimated No. Responses Per Respondent	Estimated Total Annual Responses	Estimated Hours Per Response	Estimated Total Annual Burden Hours
<b>Reporting Burden</b>						
State Agencies		54	4.13	223	0.677	151
LEAs/SFAs		19,600	556.176	10,901,050	0.024	259,691
Individuals / Households		5,390,000	1.03	5,551,000	0.121	673,000

<b>TOTAL</b>		<b>5,409,654</b>		<b>16,452,273</b>		<b>932,842</b>
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<b>Recordkeeping (State Agencies)</b>								
	Section	Estimated Number of Respondents	Frequency of Response	Average Annual Responses	Average Burden per Response	Annual Burden Hours	Current OMB approved Burden	Due to Program Adjustment
SAs must maintain agreement with SNAP SA for conducting direct certification.	7 CFR 245.6(b)(1)(iv)	54	1	54	0.1	5	5	-
SAs maintain annual October data on number of schools participating in Provisions 1, 2, or 3and extensions granted.	245.12(h)(4)	43	155	6,665	0.25	1,666	1,666	-
SAs maintain verification data collected from SFAs	245.12(i)	54	1	54	0.20	11	11	-
SAs that fail to meet the direct certification benchmark must maintain a <i>Continuous Improvement Plan</i>	245.13(g)	18	1	18	0.5	9	9	-
<b>State Agency Recordkeeping Burden Total</b>		<b>54</b>		<b>6,791</b>		<b>1,691</b>	<b>1,691</b>	<b>-</b>
<b>Recordkeeping (Local Educational Agencies)</b>								
<b>LEAs must maintain documentation substantiating eligibility determinations for 3 years after the fiscal year.</b>	<b>245.6(e)</b>	<b>19,600</b>	<b>1</b>	<b>19,600</b>	<b>0.08</b>	<b>1,568</b>	<b>1,699</b>	<b>(101)</b>
SFAs must retain records of schools implementing Provision 1, 2 or 3 for 3 years after submission of the last claim for reimbursement.	245.9(g)&(h)	1,092	1	1,092	2.4715	2,699	4,368	-1,669
<b>Local Educational Authority Recordkeeping Burden</b>		<b>19,600</b>		<b>20,692</b>		<b>4,267</b>	<b>4,368</b>	<b>(101)</b>
<b>Total Recordkeeping Burden for Part 245 with Revisions</b>		<b>19,654</b>	<b>1.40</b>	<b>27,483</b>	<b>0.22</b>	<b>5,958</b>	<b>6,059</b>	<b>(101)</b>

**Recordkeeping Summary:**

Affected Public	Form Number	Estimated No. Respondents	Estimated No. Responses Per Respondent	Estimated Total Annual Responses	Estimated Hours Per Response	Estimated Total Annual Burden Hours
<b>Recordkeeping Burden</b>						
State Agencies		54	125.76	6,791	0.249	1,691
LEAs/SFAs		19,600	1.056	20,692	0.206	4,267
<b>TOTAL</b>		<b>19,654</b>		<b>27,483</b>		<b>5,958</b>

Public Notification (State Agencies)								
SA publicly announces the annual family-size income standards to be used in eligibility determinations for free or reduced price meals and for free milk.	245.3(a) 245.12(a) (2)	54	1	54	0.10	5.4	.6	-
State Agency Recordkeeping Burden Total		54		54		5.4	5.6	-
Public Notification (Local Educational Agencies)								
LEAs publicly announce criteria for determining eligibility of children for free and reduced price meals (or free milk) in an annual media release or participation in Provision 1, 2, or 3.	245.5.5 & 245.9 & 245.3(b)	19,822	1	19,822	0.25	4,956	0	4,956
LEAs publicly announce method to make an oral or written request for a hearing.	245.7(a) (2)(i)	19,822	1	19,822	0.1	1,982	0	1,982
Local Educational Authority Public Notification Burden		19,822		39,644		6,938	0	6,938
Total Public Notification Burden for Part 245 with Revisions		19,876	2.0	39,698	0.18	6,943	5	6,943

**Public Notification Summary:**

Affected Public	Form Number	Estimated No. Respondents	Estimated No. Responses Per Respondent	Estimated Total Annual Responses	Estimated Hours Per Response	Estimated Total Annual Burden Hours
<b>Public Notification Burden</b>						
State Agencies		54	1	54	0.1	5.4
LEAs		19,822	1	39,644	0.18	6,938
<b>TOTAL</b>		<b>19,876</b>		<b>39,698</b>		<b>6,943</b>

**Burden Summary (Reporting, Recordkeeping, and Public Notification):**

SUMMARY OF BURDEN (OMB #0584-0026) 7 CFR 245	
<b>TOTAL NO. RESPONDENTS</b>	<b>5,409,876</b>
<b>AVERAGE NO. RESPONSES PER RESPONDENT</b>	<b>3.054</b>
<b>TOTAL ANNUAL RESPONSES</b>	<b>16,519,454</b>
<b>AVERAGE HOURS PER RESPONSE</b>	<b>0.057</b>
<b>TOTAL BURDEN HOURS FOR PART 245 WITH REVISIONS</b>	<b>945,743</b>
<b>CURRENT OMB INVENTORY FOR PART 245</b>	<b>949,777</b>
<b>BURDEN REVISION REQUESTED</b>	<b>(4,034)</b>

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

The estimate of respondent cost is based on the burden estimates and utilizes the United States 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 hourly mean wage (for education-related occupations) for functions performed by State agency and local education agency staff are estimated at \$25.10 per staff hour.

TOTAL COST TO PUBLIC = 945,743 hours X \$25.10 per hour = \$23,738,149.30

**A13. Estimates of Other Total Annual Cost Burden.**

**Provide estimates of the total annual cost burden to respondents or recordkeepers 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 operation/maintenance costs associated with this information collection.

**A14. Provide Estimates of Annualized Cost to the Federal Government.**

**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.**

It is estimated that Federal FNS employees receiving an average General Schedule (GS) grade 12 step 6 wage based on the 2016 Washington DC-Northern Virginia locality area spend approximately 1,200 hours collecting and analyzing data received from State agencies for 7 CFR Part 245:

$$\$43.32 \times 1,200 = \$51,984 \text{ (estimated annualized cost to the Federal government).}$$

The method used to estimate this cost was an identification of functions performed by FNS staff and the associated amount of time spent performing those identified functions.

#### **A15. Explanation of Program Changes or Adjustments.**

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

This is a revision of a currently approved information collection. The approved burden inventory at the time the 60-day Notice was published in the Federal Register was 966,023 burden hours and 18,561,082 responses. Subsequently, the burden was reduced to 949,777 hours due to removing 15,868 hours and 378 hours of reporting burden for the removal of the FNS-742 and FNS-874 (formerly the FNS-742a), respectively. This also removed 20,914 and 1,456 responses, respectively; with a revised total responses of 18,538,712. These two forms were merged into the information collection for the Food Program Reporting System (FPRS), OMB control number 0584-0594. The removal of FNS-742 and FNS-874 resulted in a revision of the burden reported in

the 60-Day Notice from 960,821 burden hours and 16,540,513 responses to 945,743 hours and 16,519,456 responses.

This information collection is currently approved with 949,777 burden hours and 18,538,712 responses. The total reporting and recordkeeping burden hours associated with this revision will decrease by 10,977 hours, while 6,943 hours will be added to account for public notification burden. This results in a total burden hour decrease of 4,034 hours. This decrease is due to adjustments. Adjustments in the number of LEAs removed 46,543 hours reporting burden and removed 101 hours of recordkeeping burden. A decrease in time per response removed 2,963 hours reporting burden. Adjustments in the number of households added 38,686 hours reporting burden. A slight adjustment in the number of SAs (FNS now estimates 54 instead of 56 SAs) removed 1 hour of reporting burden. Adjustments were also made to correctly establish 6,938 hours public notification burden and move 5 hours reporting burden to public notification. In addition, two activities were removed since they involved fewer than nine entities, which removed 49 reporting hours. The adjustments in the number of SAs, LEAs/SFAs, and in the households also reduced the responses for this collection by 2,019,258. For this renewal, FNS estimates that this information collection will have 945,743 burden hours and 16,519,454 responses. All details are highlighted in the burden chart and are explained in burden narrative (Appendices A and B).

**A16. 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.**

This collection does not entail planned statistical use and there are no plans to publish the results of this collection for statistical analyses.

**A17. 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.

**A18. 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.