<u>Estimate of the Information Collection Burden for</u> <u>State Agency Administrative Expense Funds – 7 CFR Part 235 (OMB #0584-0067)</u>

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

- 1. Section 235.3(b) requires each SA administering CN Programs to enter into a written agreement with FNS (FNS-74). FNS estimates that 75 SAs and alternate SAs will file 1 report annually for a total of 75 responses. The estimated average number of burden hours per response is 0.25 resulting in an estimated total annual burden hours of 19 (75 x 0.25 = 19).
- 2. Sections 235.5(b)&(c) require each SA to submit to FNS for approval an initial State Administrative Expense (SAE) plan and any amendments. FNS estimates that 84 SAs and alternate SAs will each file 0.357 reports annually for a total of 30 responses. The estimated average number of burden hours per response is 8 resulting in an estimated total annual burden hours of 240 (30 x 8 = 240).
- 3. Section 235.5(d) requires each SA to annually submit to FNS a State Administrative Expense Funds Reallocation Report (FNS-525) on the use of SAE funds. FNS estimates that 84 SAs and alternate SAs that will each file 1 report annually for a total of 84 responses. The estimated average number of burden hours per response is 12 for 23 SAs receiving reallocated funds and 0.5 for 61 SAs not receiving reallocated funds resulting in an estimated total annual burden hours of 308 ((23 x 12 = 276) + (61 x 0.5 = 30) = 306). This burden is being reduced by 2 hours due to four fewer State agencies.
- 4. Section 235.7(b) requires each SA to also submit an annual report containing information on School Food Authorities under agreement with the State agency to participate in the National School Lunch or Commodity School programs. FNS estimates that 56 SAs will each file 1 report annually for a total of 56 responses. The estimated average number of burden hours per response is 1 resulting in an estimated total annual burden hours of 56 (56 x 1 = 56).

Activities removed since prior approval / or with this approval:

Section 235.7(b) requires each SA to submit a quarterly Financial Status Report (FNS-777) to FNS on the use of SAE funds. FNS estimates that 87 SAs will each file 4 reports annually for a total of 348 responses. The estimated average number of burden hours per response is 0.5 resulting in an estimated total annual burden hours of 174 (348 x 0.5 = 174). This reporting burden is currently captured in the OMB #0584-0594 information collection for the Food Program Reporting System (FPRS). Therefore, 174 hours of duplicated reporting burden is being removed from this information collection.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

- Section 235.7(a) requires each SA to keep records on the expenditure of State administrative expense (SAE) funds and maintain current accounting records which shall adequately identify fund authorizations, obligations, unobligated balances, assets, liabilities, outlays and income. FNS estimates that 84 SAs and alternate SAs will each file 26 reports annually on *allocated* SAE funds for a total of 2,184 responses. FNS estimates that 23 SAs will each file 26 reports annually on *reallocated* SAE funds for a total of 598 responses. FNS estimates that 67 SAs and alternate SAs will each file 1 report annually on *carryover* SAE funds for a total of 67 responses. The total number of responses is 2,849. The estimated average number of burden hours per response is 2 resulting in an estimated total annual burden hours of 5,698 (2,849 x 2 = 5,698). This burden was reduced by 5,876 hours due adjusting the frequency of records to 26, the time per record to two hours, and three fewer State agencies.
- 2. Section 235.7(a) requires each SA to make available its records upon request by FNS, OIG, or the U.S. Comptroller General. FNS estimates that 75 SAs and alternate SAs will each file 1 Federal-State agreement (FNS-74). The estimated average number of burden hours per response is 0.083 resulting in an estimated total annual burden hours of 6 (75 x 0.083 = 6).
- 3. Sections 235.9(c)(d) require the SA to comply with 2 CFR part 200 (which has replaced 7 CFR part 3016) regarding procurement procedures and utilization and disposition of property acquired with SAE funds. FNS estimates that there are 84 SAs that will file 1 record annually for a total of 84 records. The estimated average number of burden hours per record is 3 hours resulting in an estimated total annual burden hours of 252 hours (84 x 3 = 252). **This burden is being reduced by 9 hours due to three fewer record keepers.**
- 4. Section 235.11(a) requires SAs to identify and document expenditure of funds from State revenues to meet the State funding requirement. FNS estimates that there are 54 SAs that will each file 4 records annually for a total of 216 records. The estimated average number of burden hours per record is 0.25 hours resulting in an estimated total annual burden hours of 54 hours (216 x 0.25 = 54). This burden is being reduced by 856 hours due to correcting the frequency to quarterly and reducing the time in half to reduce duplicate burden that is already accounted for in the quarterly recordkeeping for the FNS-777.

Changes made for FY16 renewal:

The previously approved burden was 13,548 hours and 12,890 responses. This revision requests a burden of 6,631 hours and 3,469 responses resulting in a net decrease of 6,917 total burden hours (6,741 recordkeeping hours and 176 reporting hours) and 9,421 fewer responses. The following adjustments were made for this revision:

• update the number of State Agencies (decreased from 87 to 84) resulting in a decrease of 321 recordkeeping burden hours and 2 reporting hours;

- adjust the burden for maintaining accounting records (decreased from 104 to 26) due to biweekly electronic system processing and adjusts the time per response (from 1 to 2 hours) resulting in a decrease of 5,564 recordkeeping hours;
- remove 856 recordkeeping hours of duplicate burden since the burden of documenting expenditures of funds from State sources is already accounted for in the quarterly recordkeeping for the FNS-777 Financial Status Report;
- remove 174 reporting hours of duplicate burden associated with form FNS-777 Financial Status Report as this burden is associated with information collection for the Food Program Reporting System (FPRS), OMB Control Number 0584-0594, expiration date June 30, 2017.

Note: The burden associated with form FNS-525 State Administrative Expense Funds Reallocation Report is proposed for removal and transfer to the FPRS information collection, OMB Control Number 0584-0594, expiration date June 30, 2017, to accommodate electronic reporting of data. This change will be submitted separately and will result in an additional removal of 308 reporting hours occurring prior to the next renewal of the information collection.