

SUPPORTING STATEMENT FOR
OMB CONTROL NUMBER 0584-0006
ADMINISTRATIVE REVIEWS IN THE SCHOOL NUTRITION PROGRAMS
FINAL RULE - RIN 0584-AE30

Susan Weeks, Program Analyst
Food and Nutrition Service, USDA
Special Nutrition Programs
Child Nutrition Programs
Program Monitoring Branch

3101 Park Center Drive

Alexandria, VA 22302

PH: 703-305-1506

susan.weeks@fns.usda.gov

Table of Contents

A1. Circumstances that make the collection of information necessary.....3

A2. Purpose and Use of the Information.....4

A3. Use of the Information Technology and Burden Reduction.....5

A4. Efforts to Identify Duplication.....6

A5. Impacts on Small Businesses or Other Small Entities.....7

A6. Consequences of Collecting the Information Less Frequently.....7

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....8

A8. Comments to the Federal Register Notice and Efforts for Consultation.....9

A9. Explain any decision to provide any payment or gift to respondents.....10

A10. Assurances of Confidentiality Provided to Respondents.....10

A11. Justification for any questions of a sensitive nature.....14

A12. Estimates of the Hour Burden of the Collection of Information.....14

A13. Estimate of Other Total Annual Cost Burden.....20

A14. Provide Estimates of Annualized Cost to the Federal Government.....20

A15. Explanation of Program Changes or Adjustments.....21

A16. Plans for tabulation, and publication and project time schedule.....22

A17. Displaying the OMB Approval Expiration Date.....22

A18. Exceptions to the Certification Statement Identified in Item 19.....22

Attachments

- A. Burden Chart for 0584-0006 7 CFR Part 210 National School Lunch Program
- B. Estimate of the Information Collection Burden for the National School Lunch Program
- C. Public Comments for rule (C1 through C29)
 - 1 Attachment C1 SNA. Admin_Review_Comments
 - 2 Attachment C2 CFPA-ARComments-2015

- 3 Attachment C3 Michigan Department of Education
- 4 Attachment C4 MN Department of Education. Karen Mitterholzer
- 5 Attachment C5 Comments South Dakota
- 6 Attachment C6 State Education Department-The University of the State of NY
- 7 Attachment C7 Utah State Office of Education
- 8 Attachment C8 Public Schools of NC. Lynn Harvey
- 9 Attachment C9 Public Schools of NC. Anna Bristow
- 10 Attachment C10 Public Schools of NC.Crews
- 11 Attachment C11 Public Schools of NC.Patty Green
- 12 Attachment C12 Public Schools of NC. Sherry Held
- 13 Attachment C13 Public Schools of NC. Sarah Hinton
- 14 Attachment C14 Public Schools of NC. Jennifer Hopkins
- 15 Attachment C15 Public Schools of NC. Farzi Katkhordeh1
- 16 Attachment C16 Public Schools of NC. Myra Mayse
- 17 Attachment C17 Public Schools of NC.Leslie Otts
- 18 Attachment C18 Public Schools of NC. Becky Sharpe
- 19 Attachment C19 Public Schools of NC.Jeffrey Squires
- 20 Attachment C20 Public Schools of NC. SarAnn Suttles
- 21 Attachment C21 Public Schools of NC. Zoe McKay-Tucker
- 22 Attachment C22 Public Schools of NC. Trip Warren
- 23 Attachment C23 Public Schools of NC. Karla Wheeler
- 24 Attachment C24 Public Schools of NC.ReginaldRoss
- 25 Attachment C25 PEW
- 26 Attachment C26 Jacquelyn McGowan
- 27 Attachment C27 Lynn Shore
- 28 Attachment C28 Cynthia Ervin
- 29 Attachment C29 S Wright

D. Public Comments & FNS Responses for FNS-640

- E. Form FNS-640 Administrative Review Data Report (formerly the Coordinated Review Effort (CRE) Data Report)
- F. OMB# 0584-0594 Food Programs Reporting System (FPRS) Home Screen with OMB Information and Public Burden Statement
- G. Form FNS-10 Report of School Operations (OMB# 0584-0594)
- H. Form FNS-13 Annual Report of State Revenue Matching (OMB# 0584-0594)
- I. Form FNS-828 School Food Authority Paid Lunch Price Report (OMB# 0584-0594)
- J. Form FNS-777 Financial Status Report (OMB# 0584-0594)

A. JUSTIFICATION

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 the currently approved information collection for the National School Lunch Program – Part 210, associated with OMB control number 0584-0006 due to rulemaking. Section 10 of the Child Nutrition Act of 1966 (42 U.S.C. 1779) requires the Secretary of Agriculture to prescribe such regulations as deemed necessary to carry out this Act and the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1751 et seq.). The NSLA, as amended, authorizes the National School Lunch Program (NSLP) to safeguard the health and well-being of the Nation's children and provide free or reduced-price school lunches to eligible students through subsidies to schools. As required, the Secretary of Agriculture issued 7 CFR Part 210, which sets forth policies and procedures for the administration and operation of the NSLP. The United States Department of Agriculture (USDA) provides States with general and special cash assistance and donations of foods to assist schools in serving nutritious lunches to children each school day. Participating schools must serve lunches that are nutritionally adequate, and maintain menu and production records to demonstrate compliance with the meal requirements. This information collection is required to administer and operate this program in accordance with the NSLA. All of the reporting and recordkeeping requirements associated with the NSLP are currently approved by the Office of Management and Budget and are in force.

This revision due to rulemaking is for the final rule titled: “Administrative Reviews in the School Nutrition Programs” (RIN 0584-AE30). This final rule implements the remaining two statutory provisions from Section 207 of HHFKA, which amended section 22 of the Richard B. Russell National School Lunch Act (NSLA), 42 U.S.C. 1769c, requiring that each State educational agency shall:

1. The administrative review process be a unified accountability system in which schools in each Local Educational Agency (LEA) are selected for review based on criteria established by the Secretary; and
2. Report the final results of the reviews to the public in the State in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary.

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.

This information is required to administer and operate this program in accordance with the NSLA. These requirements are explained in the “Estimate of the Information Collection Burden for the National School Lunch Program (OMB control # 0584-0006)” located in Attachment B. The Program is administered at the State Agency (SA) and School Food Authority (SFA) levels and the Act requires that accounts and records as may be necessary to enable FNS to determine whether the program is in compliance with this Act and the regulations.

The current revision due to rulemaking for the final rule titled: “Administrative Reviews in the School Nutrition Programs” (RIN 0584-AE30) adds new burden, but also removes some burden from the current information collection due to streamlining methods imposed by the final rule. This final rule largely reflects the updated administrative review process developed by the School Meals Administrative Review Reinvention Team (SMARRT), a 26-member team consisting of staff from Food and Nutrition Service (FNS) Headquarters, the seven Regional Offices, and SA staff from Kansas, Michigan, New York, North Carolina, Oregon, Pennsylvania and Texas (representing each of the FNS Regions). FNS assembled the team to carry out HHFKA’s mandate for a unified accountability system. The other purpose of this rule includes posting the final results of the administrative review of a SFA by the SA and making it available to the public on request in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary.

State agencies (SA) report program data to FNS using FNS forms, although this revision is not affecting any forms at this time. The new risk assessment tools and forms associated with the updated administrative review process will be addressed separately in a 60-day notice to be published in the Federal Register to align with the implementing administrative review rule. The FNS-640 (Administrative Review Data Report) is a currently existing report which is being renamed and for which proposed revisions have been published in a Federal Register Notice (volume 81, number 47, pages 12683-12684) dated March 10, 2016. The other forms related to the National School Lunch Program information collection remain unchanged. These include the

FNS forms that are collected via Food Programs Reporting System are FNS-10 (Report of School Operations), FNS-13 (Annual Report of State Revenue Matching), FNS-777 (Financial Status Report), and FNS-828 (School Food Authority Paid Lunch Price Report). The reporting burden for these forms is included in the information collection for the Food Programs Reporting System (FPRS), OMB Control #0584-0594, expiration date 6/30/2017. The recordkeeping burden is included in this collection.

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, 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 56 State agencies that administer the NSLP submit some Program and financial data to FNS electronically via the Food Programs Reporting System (FPRS), at <https://www.FPRS.usda.gov> using forms FNS-10, FNS-13, FNS-777, and FNS-828, which are included in the FPRS information collection, OMB control # 0584-0594. State agencies collect participation and meal count data from SFAs via their own electronic systems. There is a small amount of non-electronic submissions that are sent via email, flash drive or facsimile such as providing records for Management Evaluations to FNS upon request. The FNS-

640 form is currently submitted via email. FNS plans to make the FNS-640 available electronically via FPRS as well (we will submit a change request with screen shots once available). FNS estimates that 98% of the information submitted in this collection is collected electronically (via FPRS or the State agency systems) and only a negligible amount is submitted non-electronically. Overall, out of the total 49,246,996 responses for this collection, FNS estimates that approximately 2% (984,940 responses) will be submitted non-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 purposes described in Question 2.

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and state administrative agency requirements. FNS solely administers and monitors the NSLP.

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. FNS estimates that 98% of respondents (approximately 19,426 of the SFAs and all of the 101,332 schools) 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.

The information is collected for the purpose of administering an ongoing data collection for this program. Applications can be accepted and agreements executed at any time, although generally these occur shortly before the beginning of a school year. SFAs submit claims for reimbursement for every month they operate because funds for NSLP are budgeted on a fiscal year basis. If the data is collected less frequently, FNS would not be able to ensure program integrity, properly fund Programs or monitor funding and program trends.

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;**

SAs submit monthly reports via FPRS on the FNS-10 to 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.

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, 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 on May 11, 2015 in Federal Register, Vol. 80, No. 90, pp. 26846 - 26870. The comment period ended on July 10, 2015. Twenty-nine of the forty-eight comments received in response to the agency's notice were related to information collection. Twenty-four commenters addressed the administrative review forms and tools, although the actual forms and tools associated with the updated administrative review process will be published for comment in a separate Federal Register Notice. A number of comments requested the inclusion of SAs in the process for finalizing the tools and forms associated with the administrative review. FNS recognizes the valuable knowledge that SAs have gained through the voluntary implementation of the updated administrative review process. FNS has incorporated SA feedback on the process, tools, and forms annually and will continue to seek SA input. Most commenters discussed perceived duplication in the administrative review forms and suggested reexamining the risk indicator tools and worksheets to make them more effective and less burdensome. Twenty-seven commenters addressed the proposed transparency requirement. While several commenters did not support the public posting of administrative review results, the majority of comments on this

provision supported the public posting of a summary of the administrative review results, and suggested shifting the responsibility for this requirement to the local (LEA/SFA) level, as there are public notification requirements already in place for other program elements and parents and interested public are likely to access their local school districts website more readily than the SA website. Commenters recommended ways to implement this transparency requirement, and confirmed that a sample template and format for public posting should be provided. FNS recognizes the concerns about requiring SAs to make publicly available the administrative review results. Therefore, this final rule allows SAs the discretion to require that SFAs post a summary of the results, and make the report available to the public upon request. This SA flexibility is consistent with the statutory intent to promote transparency and public access to the administrative review results. A summary of the results, whether provided by the SA or the SFA, must be posted not later than 30 days after the SA provides the final results of the review to the SFA. Accordingly, 7 CFR 210.18(m) of this final rule retains the requirement that SAs post the results but includes an option for the SA to require an SFA to post a summary of the review results and make the administrative review report available to the public upon request.

Additionally, FNS published a 60-Day Notice for form FNS-640 on March 10, 2016 in the Federal Register, Vol. 81, pages 12683-12684. The comment period ended on May 9, 2016. Thirteen unique comments were received (we received one duplicate) and are available in the Regulations.gov docket [FNS-2016-0029](#). No comments opposed the revision and there was agreement generally that the report was needed. However, there were comments questioning the necessity and utility/benefit of specific information being requested and collected.

FNS provided direct responses to eight of the thirteen commenters (the remaining relevant comments did not include contact information.) The major areas of concern identified by commenters are listed below. See Appendix D for individual comments and responses:

- **Burden on the SAs:** Ten comments expressed that with the length of the form and data being reported, it will take more than 1 hour for each SFA reviewed, especially with the additional site level data being reported. It was also noted that SAs are already overwhelmed with the current Administrative Review process & timeline as well as the new Procurement review requirements and procedures.

Response: We understand that collecting the data at the site level may increase the burden on the State Agencies in the short term. We are adjusting the burden estimate but also expect it to decrease as electronic systems are developed. The majority of SAs are currently using electronic systems with the capability to complete reporting aspects electronically.

We would also like to clarify that the revised form will be a flat spreadsheet (Excel) to include all data elements which will allow for reporting of more than one SFA and/or sites.

The proposed data elements exist in the current Administrative Review. Select Administrative Review forms to include the current S-1 will be revised to include all data elements needed to complete the FNS-640. Additionally, the instructions for the

report will include the location of the data element in the forms. We are hoping this will make the reporting process and data entry more seamless.

Collecting this information will help FNS to focus our monitoring and Program Integrity efforts, through data analysis. More specifically, the national collection of this information will help us better understand the underlying causes of program error and improper payments.

- **Costs and Development of Electronic Systems:** Seven comments expressed concern with additional costs (administrative, staff, technology, other...) as well as the turnaround time needed for electronic systems development.

Response: We understand the need to allow time for system development; FNS will provide alternatives for the first year.

- **FPRS:** Reporting information at the site level will create very large reports and files for submission, especially for the larger SAs and large SFAs. Two comments expressed concern with FPRS' capacity to accept files. There have been previous issues with FPRS timing out when uploading large files were noted.

Response: We are aware of previous difficulties with the upload of large files and are working with our contractor to address the issues.

- **Instruction and Edit Checks and Training:** Two comments included requests were made for strong edit checks to ensure accuracy and to reduce the need for follow-up due to errors.

Response: Instructions and edit checks will be provided for completing the report. FNS will offer technical assistance and training to include a webinar series, which will provide a demonstration on how to complete the revised form.

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 a result of legislative, regulatory, or administrative changes. Regional offices are in contact with State agencies which provide feedback on FNS processes and procedures for this information collection.

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 will comply with the Privacy Act of 1974. No confidential information is associated with this information collection.

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 information collection.

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

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:

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 the currently approved collection. The number of respondents for this collection is 121,210 (this includes 56 SA+ 19,822 SFA + 101,332 Schools). The total number of annual responses for this request is 49,756,388 (this includes 502,488 total annual responses for reporting + 49,246,996 total annual responses for recordkeeping + 6,944 total annual responses for third party disclosure (known public notification)) The total requested burden for collect revision is 9,873,218 (this includes 353,773 for reporting + 9,517,709 for recordkeeping + 1,736 for third party disclosure. This revision will add 1,823 burden hours in the OMB information collection inventory. The following tables and Attachments A and B reflect the estimated burden associated with this information collection for each type of respondent:

ESTIMATED ANNUAL BURDEN FOR 0584-0006, NATIONAL SCHOOL LUNCH PROGRAM – 7 CFR PART 210 – REVISION OF AN APPROVED COLLECTION

REPORTING						
Description of Activities	Regulation Citation	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Annual Burden Hours
<i>State agencies report to FNS the names of large</i>	<i>210.18(d)(2) & 210.18(i) &</i>	56	-	56	0.2	(11)

<i>school food authorities exceeding administrative review thresholds. (REMOVED)</i>	210.18(o)(1) & 210.20(a)(5)					
SA notifies SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with right to appeal.	210.18(i)(3)	56	118	6,608	8	52,864
SA provides the CACFP SA with a list of all NSLP schools with at least 50% or more children eligible for free or reduced price meals by February 1 each year.	210.19(f)	56	1	56	2	112
SAs report the results of reviews by March 1 each school year. (FNS-640)	210.20(a)(5) & 210.18(n)&(o)(2)	56	1	56	2.5	140
SA reports to FNS schools' compliance with food safety inspections.	210.20(a)(7)	56	1	56	1.5	84
Total SA Reporting		56		6,776		53,200
SFA provides SA with list of all schools with at least 50% free or reduced-price enrolled children and the attendance boundaries for those schools upon request of a CACFP sponsor of homes.	210.9(b)(21)	19,822	1.25	24,778	0.25	6,194
SFAs review NSLP afterschool care programs.	210.9(c)(7)	482	2	964	0.25	241
SFA submits to the SA monthly claims for reimbursement and eligibility data for enrolled children for October.	210.15(a)(1) & 210.8(b)&(c)	19,822	10.15	201,193	1	201,193
SFA submits to the SA an application, agreement, Free and Reduced Price Policy Statement, commodity preference, and annual certifications.	210.15(a)(2)&(4) & 210.9(a&b) & 210.7(d)(2)	19,822	1	19,822	0.25	4,956
SFA submits to the SA a written response to reviews documenting corrective action for Program deficiencies.	210.15(a)(3) & 210.18(k)(2)	6,607	1	6,607	8	52,856
SFA reports to the SA the number of safety inspections obtained by	210.15(a)(7)	19,822	1	19,822	0.5	9,911

each school.						
School food authorities shall report prices of paid lunches for each school to the State agency.	210.15(a)(8) & 210.14(e)(7)	19,822	1	19,822	0.25	4,956
Total SFA Reporting		19,822		293,008		280,307
Schools shall post the most recent food safety inspection and provide a copy upon request.	210.13(b)	101,332	2	202,664	0.1	20,266
Total School Reporting		101,332		202,664		20,266
Total Reporting		121,210		502,448		353,773

*This portion of the burden is third-party disclosure burden and has been entered as such in ROCIS.

RECORDKEEPING						
Description of Activities	Regulation Citation	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Annual Burden Hours
SA maintains accounting records and source documents to control the receipt, custody and disbursement of Federal NSLP funds and documentation supporting all SFA claims paid by the SA. (FNS-10)	210.20(b)(1&2) & 210.23(c) & 210.5	56	354	19,824	3	59,472
SA maintains documentation to support the amount of State funds reported used for State revenue matching requirements. (FNS-13)	210.20(b)(3) & 210.17(g)&(h)	56	1	56	1	56
SA maintains records of all reviews and audits (including Program violations, corrective action, fiscal action and withholding of payments). (FNS-640)	210.20(b)(6) & 210.18(o)(f) (k,l,m) & 210.23(c)	56	118	6,608	8	52,878
SA maintains documentation of fiscal action taken to disallow improper claims submitted by SFAs, as determined through claims processing, reviews, and USDA	210.20(b)(7) & 210.19(c) & 210.18(o)	56	118	6,608	0.5	3,304

audits.						
SA shall prepare records on schools eligible to received USDA donated foods.	210.20(b)(10) & 210.19(b)	56	1	56	3	168
SA maintains records from SFAs of food safety inspections obtained by schools.	210.20(b)(11)	56	354	19,824	0.25	4,956
SA maintains records of paid reimbursable lunch prices obtained from SFAs. (FNS-828)	210.20(b)(12) & 210.14(e)(7)	56	354	19,824	0.2	3,965
SA maintains documentation of compliance with professional standards for State directors of School Nutrition Programs.	210.20(b)(14)	56	1	56	0.25	14
SA maintains documentation of LEA/SFA compliance with nutrition standards for competitive foods.	210.18(h)(iv)	56	118	6,608	0.25	1,652
Total SA Recordkeeping		56		79,464		126,465
SFA maintains files of children directly certified.	210.9(b)(19)	19,822	4	79,288	0.65	51,537
LEAs & SFAs maintain documentation of compliance with nutrition standards for all competitive food for sale to students.	210.11(b)(2)	19,822	1	19,822	20	396,440
SFA maintains documentation of participation data by school to support monthly Claim for Reimbursement and data used in the claims review process.	210.15(b)(1) & 210.8(a)(5)	19,822	10	198,220	5	991,100
SFAs maintain documentation to support performance based reimbursement and the attestation of compliance.	210.15(b)(2) & 210.7(d)(2)	19,822	1	19,822	0.25	4,956
SFA maintains files of school meal applications.	210.15(b)(4) & 210.9(b)(18&20)	19,822	1	19,822	2.66	52,727
SFA maintains calculations of average paid lunch prices and adjustments.	210.15(b)(6) & 210.14(e)	19,822	1	19,822	5	99,110
SFA documents revenue from sale of non-program	210.15(b)(7) & 210.14(f)	19,822	1	19,822	10	198,220

foods accrues to the nonprofit school food service account and is compliant with requirements.						
SFA maintains documentation of compliance with professional standards for school nutrition directors, managers and personnel.	210.15(b)(8); 210.30(g)	19,822	1	19,822	0.25	4,955
Total SFA Recordkeeping		19,822		396,440		1,799,045
School maintains written statements signed by a license physician of the need for substitutions and recommending alternate foods.	210.10(m)	30,400	1	30,400	0.08	2,432
Organizations responsible for food service in schools maintain records.	210.11(b)(2)	101,332	1	101,332	0.5	50,666
School maintains documentation of participation data by school to support the Claim for Reimbursement.	210.15(b)(1)	101,332	180	18,239,760	0.15	2,735,964
Schools maintain production and menu records.	210.15(b)(2)(3) & 210.10(a)(3)	101,332	180	18,239,760	0.25	4,559,940
School maintains food safety records and records from most recent food safety inspection.	210.15(b)(5) & 210.13(b&c)	101,332	120	12,159,840	0.02	243,197
Total School Recordkeeping		101,332		48,771,092		7,592,199
Total Recordkeeping		121,210		49,246,996		9,517,709

PUBLIC NOTIFICATION						
Description of Activities	Regulation Citation	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Annual Burden Hours
<i>State agencies must post a summary of the most recent administrative review results of SFAs on the SA website and make a copy available</i>	210.18(m)(1)	56	124	6,944	0.25	1,736

<i>upon request.</i>						
Total Public Notification		56		6,944		1,736

BURDEN SUMMARY (OMB #0584-0006)					
	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Burden Hours
Reporting Total	121,210		502,448		353,773
Recordkeeping Total	121,210		49,246,996		9,517,709
Public Notification Total	56		6,944		1,736
Total Burden	121,210	410.4973847042	49,756,388	0.2	9,873,218

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 U.S. Department of Labor, Bureau of Labor Statistics, May 2015 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 \$25.48 per staff hour.

$$\text{TOTAL COST TO PUBLIC} = 9,873,218 \text{ hours} \times \$25.10 \text{ per hour} = \$247,817,764.72$$

A13. 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 questions 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 is no start-up or annual maintenance costs for this collection of information.

A14. 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 employees receiving an average General Schedule (GS) grade 12 step 6 wage based on the 2016 Washington DC-Northern Virginia locality area hourly wage rates take approximately 960 hours to analyze data received from State agencies (for the NSLP information collection; no additional hours are being added with this revision):

$\$43.32 \times 960 \text{ hours} = \$ 41,587.20$ (estimated annualized cost to the Federal government).

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 83-1.

This is a revision of a currently approved collection due to rulemaking. The information collection is currently approved with 9,871,395 total annual burden hours and 49,749,500 total annual responses. The total reporting, recordkeeping, and third-party disclosure burden hours associated

with this revision is being increased to 9,873,218 burden hours, adding 1,823 burden hours in the OMB information collection inventory. The total annual responses associated with this revision are being increased to 49,756,388 responses, adding 6,888 responses in the OMB information collection inventory. These program changes are a result of adding and modifying regulations to the reporting, recordkeeping and third party disclosure (known public notification) requirements due to rulemaking. Refer to Attachments A and B for the specific burden revisions made due to rulemaking requirements.

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.

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

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.