



9/13/15

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive

Alexandria, VA 22302-1500

TO: Steph Tatham, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Ruth Brown, Department Clearance Officer
United States Department of Agriculture
Office of Chief Information Office

FROM: Rachelle Ragland-Greene Rg and Christina Sandberg CS
Information Collection Officers
Planning and Regulatory Affairs Office
Food and Nutrition Service (FNS)

SUBJECT: Justification for Format Change to OMB Control No: 0584-0594 Food Programs Reporting System Worksheets/Forms FNS-366B, FNS 418 & FNS-640

FNS 388 B Program and Budget Summary Statement Part B - Program Activity Statement

FNS is requesting a non-substantive change to the Program and Budget Summary Statement Part B - Program Activity Statement worksheet/form FNS-366B. This form is contained in the Food Programs Reporting System package, OMB Control No. 0584-0594, expiration date of September 30, 2019.

FNS recently revised the form FNS-366B to collect additional data and modify existing collections. OMB approved this revision without change on June 8, 2016 under OMB Control No. 0584-0594. As part of the revision process, FNS expanded the form instructions to address new elements and clarify existing. Subsequent to this approval, FNS identified minor portions of the instructions that require additional clarification or error correction. These modifications do not change the data elements that this form collects or the burden estimate associated with the form.

All modifications are to the form instructions. The first modification adds a sentence to the introductory paragraph of the "Certifications" section. This sentence clarifies a distinction between standard and expedited applications. The second modification fixes a typo in the "Line 3 - Initial Applications". An incorrect cell identifier was given in an example. The third modification rewords two sentences in the introductory paragraphs of the "Fraud Investigations" section. This clarifies the difference between investigator activity and eligibility worker activity. The final modification adds a sentence to the "Line 10 - Individuals/\$/Days, Combined, (i)." This sentence clarifies which cases should be reported in this cell.

FNS-481 Report of the Summer Food Service Program for Children

The Food and Nutrition Service (FNS) is proposing to revise the current instructions contained in Form FNS-418 for the Summer Food Service Program (SFSP) to reflect the original intent to align the instructions for calculating the Average Daily Attendance (ADA) with those contained in the Form FNS-10 for School Meal Programs. The proposed revisions utilize similar language and structure from the instructions for the FNS-10 to provide more clarity on the most accurate and efficient way to calculate the ADA in SFSP. Additionally, the revision includes examples of how to calculate the ADA in order to decrease the burden on State agencies and sponsoring organizations when preparing claiming forms. This revision in the instructions does not affect the current time estimate for this form.

The pdf versions of FNS-418, which included the current instructions, were approved under 0584-0280 7 CFR Part 22, Summer Food Service Program, expiration date 8/31/19. The updates made to these versions, however, do not appear to have been captured in the FPRS collection. As of 8/27/16, FNS-418 was removed from 0584-0280 because the form and its associated reporting burden are approved under 0584-0594 and its continued inclusion in 0584-0280 was double-counting burden.

Please see below for current instructions and the proposed revisions:

Current Instruction:

4. “ADA” – SFSP average daily attendance rate (ADA) is calculated by taking the total number of meals served in a **sponsor’s primary meal service (usually lunch)** during the claim period and dividing that number by the number of **operating or meal service days** for that claim period. This results in the ADA for a sponsor on an average day during the claim period.

Revised Instruction:

4. “Average Daily Attendance” – ADA uses SFSP meal counts as a proxy for determining the attendance at a summer meal site on an average day during the claim period. ADA is calculated by taking the total number of meals served in a **site’s primary meal service** during the claim period and dividing that number by the number of **operating or meal service days** for that claim period. A site’s primary meal service is the meal at which the most meals are claimed. For most sites, this is typically lunch; however, if a site serves more meals at breakfast than at lunch, then breakfast would be considered the primary meal service. Once the ADA is calculated for each site, the **sponsor will then add the ADAs for all sites that the sponsor manages**. This will result in the ADA for the sponsor. See the following chart for an example of this calculation:

Sponsor A					
	Number of Operating Days during Claim Period	Breakfast	Lunch	Snack	ADA
Site 1	10	100	200*	50	20 (=200/10)

Site 2	15	300*			20 (=300/15)
Site 3	25	50	100	150*	6 (=150/25)
Sponsor Total ADA					46

* Indicates primary meal service for site.

In this example, each site has a different primary meal service. Each site’s primary meal service must be included in the cumulative ADA calculation for the sponsor. This cumulative ADA for the sponsor is the number that should be included on this form.

FNS-640 Merge hours from Administrative Review Data Report Form FNS-640 from OMB Control Number 0584-0006 to OMB Control Number 0584-0594 Food Program Reporting System (FPRS)

The information collection (ICR) burden associated with the FNS-640 form titled “Administrative Review Data Report” is currently approved under OMB Control #0584-0006 titled “Part 210 - National School Lunch Program” with an expiration date of 09/30/2019. In the recent approval, FNS specified that the FNS-640 report was becoming part of the FNS electronic reporting system titled, “Food Programs Reporting System (FPRS)”, approved under OMB Control #0584-0594, expiration date 9/30/2019 to facilitate accurate and timely electronic collection of data.

At this time, FNS is requesting a no material/non-substantive change to merge the reporting burden assigned to form FNS-640 from OMB Control #0584-0006, Part 210 - National School Lunch Program” to #0584-0594, “Food Programs Reporting System (FPRS)”. The current burden for the FNS-640 form is 140 hours (56 State agencies x 2.5 hours per annual response = 140 hours and 56 additional responses annually). The merge will increase the current burden and responses for OMB #0584-0594 as follows:

	<u>Currently Approved Burden for form FNS-640 to merge into #0584-0594</u>	<u>Currently Approved #0584-0594</u>	<u>New Burden After Change #0584-0594</u>
Responses	56	46,216	46,272
Hours	140	104,556	104,696

If you have any questions regarding this request, please contact Rachelle Ragland-Greene, FNS Information Collection Officer for the Food and Nutrition Service, Planning

& Regulatory Affairs Office at (703) 305-2586, Rachelle.Ragland-Greene@fns.usda.gov.
or Christina Sandberg at (703) 305-2337 at Christina.Sandberg@fns.usda.gov

Attachments:

- A. FNS-388 B Program and Budget Summary Statement Part B – Program Activity Statement
- B. FNS-481 Report of the Summer Food Service Program for Children (screenshots/pdf)
- C. FNS-640 Administrative Review Data Report Form