



August 27, 2018

United
ates
Department
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

TO: Stephanie Tatham
Office of Management and Budget Desk Officer

THROUGH: Lisa Southworth
Acting Branch Chief
Planning and Regulatory Affairs Branch
Office of Policy Support

FROM: Andrea Farmer
Branch Chief
Community Meals Branch
Policy and Program Development

SUBJECT: Justification for a Non-Substantive
Change to OMB Control Number 0584-0055

The Food and Nutrition Service (FNS) is requesting approval by the Office of Management and Budget (OMB) of a non-substantive change to the reporting burden in the information collection for the Child and Adult Care Food Program (CACFP), under OMB Number 0584-0055. FNS proposes to change the presentation of data at the sponsor/institution level.

All CACFP institutions have to report information to the State agency on the monthly claim for reimbursement. The CACFP information collection approved in February 2017 includes a requirement under 7 CFR 226.10 for sponsoring organizations and other institutions to report the number of meals claimed for reimbursement. However, the claiming process is not as simple for for-profit institutions, which must also provide information to the State agency, each month, to verify that at least 25 percent of children or adult participants enrolled for care are from low-income households.

In the past, FNS rolled the reporting of for-profit eligibility information under the broader requirements for claims submissions for all institutions listed under 7 CFR 226.10. FNS is requesting OMB approval to display the data differently. FNS proposes to separate out the requirement for verifying the eligibility of for-profit centers from the requirements for submitting claims for reimbursement listed for all institutions.

The separate line items would allow us to capture the burden associated with the monthly verification of eligibility for for-profit institutions, as follows:

1. Under 7 CFR 226.10, public, non-profit, and for-profit institutions report to the State agency the number of meals

claimed for reimbursement. FNS estimates 21,052 public, non-profit, and for-profit institutions each provide 12 reports annually for a total of 252,624 responses. However, the estimated average number of burden hours per response is revised from 1.90 to 1.67—to account for removing the requirement for verifying the eligibility of for-profit centers—resulting in estimated total burden hours of 421,365.60. This requirement is currently approved with 479,985.60 burden hours. With this change, FNS estimates that the burden hours for this requirement will be reduced by 58,620 hours. The responses remain unchanged.

2. Under 7 CFR 226.10(c) for-profit institutions submit documentation to verify the eligibility of for-profit centers. FNS estimates 9,770 for-profit institutions each provide 12 reports annually for a total of 117,240 responses. These responses were previously captured in the estimated burden for the meal claiming process. The estimated average number of burden hours per response is 0.50, resulting in estimated total burden hours of 58,620. Breaking out the eligibility requirement for the for-profit institutions from 7 CFR 226.10 will add 58,620 burden hours and 117,240 responses.

This proposed change does not affect the overall burden hours for this collection since the burden hour decrease and increase related to the separation of the requirements offset each other. The proposed change does, however, increase the responses. With this proposal, the total responses for sponsors/institutions will increase by 117,240 responses, for a total of 671,048 responses. Here is a summary of the overall burden changes to this collection:

	Currently Approved	Changes in Burden Hours/Responses	New Burden After Change
Hours	2,481,136	0	2,481,136
Responses	7,897,289	117,240	8,014,529

Please see the revised Reporting Burden Grid, *Estimates of the Hour Burden of the Collection of Information*, under Appendix A. If you have any questions regarding this request, please contact Christina Sandberg, FNS Information Collection Clearance Officer, at 703-305-2337.

Attachment: Appendix A