

Attachment C - Burden Narrative for 0584-0012 School Breakfast Program

Estimate of the Information Collection Burden for the School Breakfast Program (OMB #0584-0012)

This document explains the calculation of the information collection burden for the School Breakfast Program, OMB #0584-0012, as submitted for the renewal of the existing regulation. A notice was published in the Federal Register on May 23, 2018 in Federal Register at Vol. 83, No. 100, page 23884.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES

1. Section 220.5 states that funds to be paid to any State for the School Breakfast Program shall be made available by means of Letters of Credit issued by FNS in favor of the State agency (SA). The SA shall: (a) obtain funds needed for reimbursement to School Food Authorities (SFA) through presentation by designated State officials of a payment Voucher on Letter of Credit in accordance with procedures prescribed by FNS and approved by the U.S. Treasury Department; (b) submit requests for funds only at such times and in such amounts, as will permit prompt payment of claims or authorized advances; and (c) use the funds received from such requests without delay for the purpose for which drawn.

FNS estimates that 56 SAs will each file 36 reports annually for a total of 2,016 responses ($56 \times 36 = 2,016$). The estimated average number of burden hours per response is 0.25 resulting in estimated total burden hours of 504 ($2,016 \times .25 = 504$).

2. Section 220.15(b) states that each SA shall provide FNS and OIG opportunity to conduct management evaluations and audits, respectively, and make available its records upon request by FNS or OIG.

FNS estimates that 19 SAs will receive a ME and will each file 1 report annually for a total of 19 responses ($19 \times 1 = 19$). The estimated average number of burden hours per response is 3 resulting in estimated total burden hours of 57 ($19 \times 3 = 57$).

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITY LEVEL

1. Section 220.7(a) states that the SFA shall make written application to the SA, or FNSRO where applicable, for any school which desires to operate the School Breakfast Program, if such school did not participate in the Program in the prior fiscal year.

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FNS estimates that 168 SFAs will each file 1 report annually for a total of 168 responses ($168 \times 1 = 168$). The estimated average number of burden hours per response is 0.25 resulting in estimated total burden hours of 42 ($168 \times 0.25 = 42$).

2. Section 220.11(a) states that, to be entitled to reimbursement, each SFA shall submit to the SA, or FNSRO where applicable, a monthly Claim for Reimbursement.

FNS estimates that 19,240 SFAs will each file 10 reports annually for a total of 192,400 responses ($19,240 \times 10 = 192,400$). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 192,400 ($192,400 \times 1 = 192,400$). **This burden is reduced by 11,460 hours, from 203,860 to 192,400 hours, as an adjustment due to a decrease in the number of participating SFAs.**

3. Section 220.11(b) states that Claims not postmarked and/or submitted within 60 days shall not be paid with Program funds unless FNS grants an exception.

FNS estimates that 204 SFAs will each file 1 report annually for a total of 204 responses ($204 \times 1 = 204$). The estimated average number of burden hours per response is 0.75 resulting in estimated total burden hours of 153 ($204 \times .75 = 153$).

4. Section 220.15(c) states that audits at the institution (SFA) level shall be conducted in accordance with Office of Management and Budget regulations and the Department's implementing regulations.

FNS estimates that there are 82 SFAs that will each file 1 report annually for a total of 82 responses ($82 \times 1 = 82$). The estimated average number of burden hours per response is 2 resulting in estimated total burden hours of 164 ($82 \times 2 = 164$).

AFFECTED PUBLIC: SCHOOL SITE LEVEL

1. Section 220.11(b) states Claims for Reimbursement shall include data in sufficient detail to justify the reimbursement claimed.

FNS estimates that there are 90,972 schools that will each file 10 reports annually for a total of 909,720 responses ($90,972 \times 10 = 909,720$). The estimated average number of burden hours per response is 0.05 resulting in estimated total burden hours of 45,486 ($909,720 \times 0.05 = 45,486$). **This burden is being increased by 572 hours, from 44,914 to 45,486 hours, as an adjustment, due to an increase in the number of school.**

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES

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1. Section 220.12(a) states that SAs and SFAs shall establish such rules or regulations as are necessary to control the sale of foods in competition with breakfasts served under the Program. Such rules or regulations shall prohibit the sale of foods of minimal nutritional value in the food service areas during the breakfast periods.

FNS estimates that there are 56 SAs that will each file 1 report annually for a total of 56 responses ($56 \times 1 = 56$). The estimated average number of burden hours per response is 1 resulting in estimated total burden hours of 56 ($56 \times 1 = 56$).

2. Section 220.13(b)(1) states that each SA shall maintain Program records as necessary to support the reimbursement payments made to SFAs and reports submitted to FNS.

To support reimbursement payments, FNS estimates that 56 SAs will each file 36 records annually for a total of 2,016 responses ($56 \times 36 = 2,016$). The estimated average number of burden hours per response is 0.083 resulting in estimated total burden hours of 167 ($2,016 \times 0.083 = 167$).

3. Section 220.13(c) states that each SA shall promptly investigate complaints received or irregularities noted in connection with the operation of either program, and shall take appropriate action to correct any irregularities. State agencies shall maintain on file evidence of such investigations and actions.

FNS estimates that there are 56 SAs that will each file 1 report annually for a total of 56 responses ($56 \times 1 = 56$). The estimated average number of burden hours per response is 2 resulting in estimated total burden hours of 112 ($56 \times 2 = 112$).

4. Section 220.14(d) states that each SA shall maintain records pertaining to claims against SFAs.

FNS estimates that 56 SAs that will each file 12 reports annually for a total of 672 responses ($56 \times 12 = 672$). The estimated average number of burden hours per response is 0.25 resulting in estimated total burden hours of 168 ($672 \times 0.25 = 168$).

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES

1. Section 220.11(b) states that Claims for Reimbursement shall include data in sufficient detail to justify the reimbursement claimed and to enable the SA to provide the Reports of School Program Operations.

FNS estimates that 19,240 SFAs will each file 10 reports annually for a total of 192,400 responses ($19,240 \times 10 = 192,400$). The estimated average number of burden hours per response is 0.08 resulting in estimated total burden hours of 15,969 ($192,400 \times 0.083 = 15,969$). **This burden is being reduced by 951 hours, from 16,920 to**

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15,969 hours, as an adjustment due to a decrease in the number of participating SFAs.

AFFECTED PUBLIC: SCHOOLS

1. Section 220.8(a)(3) and 220.9(a) state that schools or SFAs must keep production and menu records for the breakfasts they produce. Schools or SFAs must maintain records of the latest nutritional analysis of the school menus conducted by the SA. Production and menu records must be maintained.

FNS estimates that 90,972 schools will each file 180 reports annually for a total of 16,374,960 responses ($90,972 \times 180 = 16,374,960$). The estimated average number of burden hours per response is 0.12 resulting in estimated total burden hours of 1,964,995 ($16,374,960 \times 0.12 = 1,964,995$). **This burden is being increased by 24,710 hours, from 1,940,285 to 1,964,995, as an adjustment due to an increase in the number of schools.**

2. Section 220.11(b) states Claims for Reimbursement shall include data in sufficient detail to justify the reimbursement claimed and to enable the SA to provide the Reports of School Program Operations.

FNS estimates that 90,972 schools will each file 180 reports annually for a total of 16,374,960 responses ($90,972 \times 180 = 16,374,960$). The estimated average number of burden hours per response is 0.1 resulting in estimated total burden hours of 1,637,496 ($16,374,960 \times 0.1 = 1,637,496$). **This burden is being increased by 20,592 hours, from 1,616,904 to 1,637,496 hours, as an adjustment due to an increase in the number of schools.**

Changes made for FY18:

Increased schools from 89,828 to 90,972.

Decreased SFAs from 20,386 to 19,240.