

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-New:**

Summer Food Site Locations for State Agencies

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**Table of Contents**

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3

A2. PURPOSE AND USE OF THE INFORMATION.....5

A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....6

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.....7

A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....8

A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....12

A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....12

A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....13

A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....13

A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....14

A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....15

A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....15

A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....15

A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....16

A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....16

APPENDIX A: FNS Response to Commenters

**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.**

Section 13 of the Richard B. Russell National School Lunch Act (NSLA) authorizes the Summer Food Service Program (SFSP) to provide low-income children with access to nutritious meals when school is not in session. Meals meeting Federal nutrition guidelines are served at no cost to all children 18 years old and under at approved SFSP sites in areas in which at least 50 percent of children are eligible for free and reduced price school meals during the school year. SFSP sites operate, by design, for a short period during the summer and their locations, hours and days of operations may not be well known to those children who depend on school lunch during the school year. The proposed FNS-905 will collect this information and make it available to the public.

Section 26 of the NSLA goes on further to mandate FNS to enter into a contract with a non-governmental organization to establish and maintain a clearinghouse to provide information to non-governmental groups located throughout the United States that assist low-income individuals or communities regarding food assistance, self-help activities to aid individuals in becoming self-reliant, and other activities that empower low-income individuals or communities to improve the lives of low-income individuals and reduce reliance on Federal, State, or local government agencies for food or other assistance. SFSP sites are a component of this assistance and are included in the clearinghouse.

Forms FNS-543 and FNS-543a were developed to satisfy this statutory requirement, and collect

information and resources to help build the capacity of emergency food providers to address the immediate needs of struggling families and individuals while promoting self-reliance and access to healthy food. The FNS-543, currently approved under OMB # 0584-0474 (expiration 2/28/2022) collects information directly from organizations providing other types of assistance and the information submitted through FNS-543a was collected and submitted by the State agencies. In order to improve efficiency and to provide a direct interface with State agencies, FNS discontinued the form FNS-543a in 2019 and developed a new form, FNS-905 under the Child Nutrition Programs to replace it. The FNS-905, similar to the FNS-543a, will voluntarily collect information about summer meal sites approved by the State agencies and may only be submitted by State agencies. Summer meal sites are locations where children can receive a meal when school is out as part of the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO).

The information collected on the new FNS-905 form, in addition to the FNS-543, will populate the USDA National Hunger Clearinghouse. The National Hunger Clearinghouse collects, develops, and distributes information and resources to help build the capacity of emergency food providers to address the immediate needs of struggling families and individuals while promoting self-reliance and access to healthy food. The information is used by FNS to fight hunger and improve nutrition by increasing participation in FNS nutrition programs through the development, coordination, and evaluation of strategic initiatives, partnerships, and outreach activities. The Clearinghouse also supports the USDA National Hunger Hotline, which refers people in need anywhere in the U.S. to food pantries, soup kitchens, model grassroots organizations and, in this case specifically, approved open summer meal sites.

Unlike other resources in the Clearinghouse, State agencies must approve all summer meal sites to be included in the database. Form FNS-905 will collect site name, location, and operating details, such as dates and times of site operation.

Thus, FNS is submitting this information collection request in order to continue collecting information mandated by Congress.

## **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 how the agency has actually used the information received from the current collection.**

During the summer months (May – September), the information collected voluntarily from State agencies on the FNS-905 will provide a resource for groups that assist low-income children, families, and communities regarding child nutrition when school is out. The FNS-905 collects details about each site such as times, days, and dates of operation, location, types of meals served, contact information and if the site is open to the public. This information is already collected by the States during the sponsor and site application process as required by regulation in 7 CFR 225.6.

Partners and the general public have used the data previously collected on the FNS-543a in the creation of mobile applications and texting services, and the data have also been used by State agencies to plan summer site visits by Program sponsors to strategically plan for future years' summer feeding operations and by researchers in academic institutions. FNS has used these data

to improve integrity and to analyze policy proposals, as well as to report to leadership real-time results that cannot be ascertained through other reporting methods. FNS expects the data collected with the FNS-905 to have the same utility.

Once per week, the data collected using the FNS-905 are posted on an open data platform that is accessible to the public at all times, so it is not possible to fully know all the users of these data. Other interested parties may include nutrition or health education professionals, state or local government health officials, nutrition councils, public interest advocates, private foundations, and corporate officials.

### **A3. Use of 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.**

State agencies approve summer meal sites, according to regulations at 7 CFR 225.6(b), which are then reported to FNS voluntarily via an Excel spreadsheet or CSV file via email. These data are then uploaded and posted publically on a weekly basis to an open data page (<http://data-cacfp-sfsp.opendata.arcgis.com/>) and integrated into public facing web tools such as the Summer Site Finder Tool, for families and children to find their nearest meal site:

<https://www.fns.usda.gov/summerfoodrocks>.

### **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.**

The summer food site location information is not collected through any other means. The FNS-905 is also the only form that can be used for collecting data about summer sites, as they must be approved by the State agencies before being made public.

**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.**

No small entities are impacted by this collection of information.

**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 SFSP is designed to operate when school is out during the summer months. Due to the limited time available for site operations, families and communities may not know where and how to find meals for children who depend on the NSLP during the school year. The site details that will be collected with the FNS-905 will be used to populate online mapping tools, texting services, and other community-built tools to help connect children with nutritious summer meals. Without the FNS-905, children, families, responders, and communities would have little to no access to this information and therefore, not collecting these data could impact program participation. These site details will also help State agencies and communities plan future efforts and efficiently allocate resources in areas of most need. FNS will use the data to determine participation and to conduct analyses as requested by leadership.

**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:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **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 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.**

**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.**

**Consultation with representatives of those from whom information is to be obtained or**



**those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The first consultation on the summer food site location data collection was conducted on Wednesday, November 8, 2017. FNS conducted a listening session for State agencies that complete FNS-543a (now the FNS-905). Feedback from the State agencies was taken into account in the development of the FNS-905 from individuals including:

- Matt Anderson, Utah State Board of Education, [matthew.anderson@schools.utah.gov](mailto:matthew.anderson@schools.utah.gov)
- Amy Bianco, Illinois State Board of Education, [abianco@isbe.net](mailto:abianco@isbe.net)
- Donna Parsons, Washington Office of Superintendent of Public Instruction, [Donna.Parsons@k12.wa.us](mailto:Donna.Parsons@k12.wa.us)

FNS also received State agency comments to the 60-day Federal Register Notice published on August 7, 2018 (FR Vol. 83, No. 152. 38361). In that notice, FNS sought comment on:

- (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;
- (b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used;
- (c) ways to enhance the quality, utility, and clarity of the information to be collected; and
- (d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

FNS received a total of 12 comments, attached and labeled as Appendix B.

The majority of comments were in support of the FNS-905 as a necessary collection of information for both the State agencies and the public. One commenter felt that the FNS-905 information collection was redundant and did not add value to their State.

Most comments confirmed the accuracy of FNS' estimate of the burden of the proposed collection of information. While some State agencies indicated it would take them longer than FNS estimated, other commenters indicated the data retrieval and reporting process is minimal after the initial development of database queries. State agencies indicated their burden would be reduced if any changes to the FNS-905 occur well before the start of the summer months to allow any modifications to their database queries.

There were multiple methods suggested by commenters about how to enhance the quality, utility, and clarity of the information to be collected.

#### *Frequency of submission*

Multiple commenters indicated that minor details of approved SFSP/SSO sites may change throughout the week, with sometimes hundreds of changes occurring in larger States. For example, an SFSP site's meal time may change by a few minutes or an SFSP site may be temporarily closed. Therefore, the commenters noted, the FNS-905 data would be of higher quality if form submissions were more frequent; however, commenters also mentioned that more frequent submissions would increase their burden.

Commenters also requested a shorter turnaround from the submission of the FNS-905 to

the time the sites are posted to the Summer Site Finder. One commenter asked for real-time updates and another asked for the weekly submission deadline to be earlier in the week. In order to balance the need for the most up to date information and State agency burden, FNS will continue to collect the FNS-905 on a weekly basis. FNS will consider how best to schedule form submission cut-off deadlines and the speed at which data are posted.

#### *Data elements*

Multiple commenters thought separate meal time and meals type columns were redundant since the type of meals served (e.g. breakfast) could be inferred from a non-empty meal time column for that meal type. FNS removed the meal type column. One commenter asked for the sponsor's first and last name to be in a single column in order to reduce State agency burden. FNS updated the instructions to allow State agencies to use the first name column for both first and last name, if needed. One commenter asked for a field for additional location information (e.g. landmarks known to communities) to better indicate where a site was located. FNS updated the FNS-905 instructions to indicate this type of information can be put in the "comments" column.

Some commenters asked for data elements to be considered required elements, or added to the FNS-905, such as two individual columns for meal start and end times, additional SFSP site types, and the addition of "county" to the final dataset FNS publishes every week. FNS will not add additional requested data elements so as to not increase State agency burden. However, using geographic software, FNS will add a county field to the

final FNS dataset based on the address of the SFSP/SSO site, which will not increase burden to the State agencies.

Commenters asked why the FNS-905 proposes to collect all types of SFSP/SSO sites, not just open sites. The FNS-905 collects all SFSP/SSO site types to help State agencies and sponsors to strategically plan future SFSP/SSO site locations after summer is over. In addition, FNS uses these data in its own analyses and reports.

Commenters inquired about the use of the site and sponsor identification fields (e.g. ID number). FNS has found that not all State agencies use these identifier fields and FNS will continue to include these optional columns in order to help with SFSP/SSO site processing. One commenter requested improvements to the SFSP/SSO site deletion process and FNS updated the “Site Status” field instructions to better explain how to use the ‘delete’ option to remove sites from the Summer Site Finder. One commenter asked for confirmation about a number of columns that only FNS completes and are not part of the information request. The instructions on the FNS-905 indicates these fields are to be completed by FNS only.

Multiple commenters shared ways to minimize the burden of the collection of information on State agencies. It was requested that full dataset submissions be allowed instead of only updated and new SFSP sites. FNS updated the instructions to include contact information for State agencies who need additional technical assistance in this area. One commenter indicated that FNS could alternatively link to individual State agencies’ web maps rather than have a

nationwide map tool. State agencies are not required to use the FNS map tools but multiple State agencies have indicated their need for the FNS mapping tools because they are not available in their State.

**A9. Explain any decisions to provide any payment or gift to respondents.**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be 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.**

There are no confidentiality/privacy concerns: The Department complies with the Privacy Act of 1974. No confidential information is associated with this collection of information.

**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.**

This information collection does not involve questions of a sensitive nature.

**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.**

There are 53 State agency respondents to this voluntary collection. State agencies can determine how frequently they submit their data. Estimates on the frequency of submissions for the FNS-905 were based on actual submissions of the FNS-543a, now the FNS-905, by State agencies in 2017. Many State agencies report that they have now automated their systems to create the data needed for the FNS-905. State agencies may submit updates as many times as they would like, and in previous years the average number of submission from each State agency per year was 8. Through a small sample of 8 State agencies in 2015 it was estimated that the average response was about 7.5 minutes.

Estimated Total Annual Burden on Respondents: 53 hours. See the table below for estimated total annual burden for the State agencies.

Respondent	Estimated # Respondents	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dx)
<b>Reporting Burden</b>					
State agencies	53	8	424	0.125	53
<b>Total Reporting Burden</b>	53		424		53

**B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Only State agencies complete the FNS-905 and the estimate of respondent cost is based on the burden estimates developed in 12(a) above. Based on the Bureau of Labor Statistics May 2018 Occupational and Wage Statistics – 13-2031 (<http://www.bls.gov/oes/current/oes132031.htm>), hourly mean wage for budget analyst functions performed by State agency staff are valued at \$32.30 per staff hour, thus the annual respondent cost is estimated at \$1,712.96 (53 hours x \$32.30). An additional 33% of the estimated annual respondent cost must be added to represent fully loaded wages, equaling \$565.29. Therefore the total estimated annual respondent cost equals \$2,278.25.

**A13. Estimates of other total annual cost burden.**

**Provide estimates of the total annual cost burden to respondents or recordkeepers 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 are no capital/start-up or ongoing operational/maintenance cost associated with this information collection.

**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.**

As most of this process is automated, the cost is minimal. The annual hours worked on preparing this data collection and the hours worked to monitor the clearinghouse is approximately 33% of an employee's time. For the purpose of this annualized cost estimate, the employee is assumed to be a GS-12 Step 1 for the Washington D.C. locality area using the

Federal GS Pay Scale published in 2018, which has an annual salary of \$81,548. An estimated \$26,910 is spent annually in staff time from other miscellaneous employees that contribute their time. An additional 33% of the estimated annual cost must be added to represent fully loaded wages, equaling \$8,880. Therefore, the total estimated cost to the Federal Government for this information collection is \$35,790.

**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-I.**

This submission is a new information collection request as a result of program changes and will add 53 hours of burden to OMB's inventory.

**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.**

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

**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 the FNS-905



**A18. Exceptions to the certification statement identified in Item 19.**

**Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."**

There are no exceptions to the certification statement.