

SUPPORTING STATEMENT - For
OMB CLEARANCE NUMBER 0584-0280
7 CFR PART 225 SUMMER FOOD SERVICE PROGRAM

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Attachments

- A. Burden Chart for OMB Control #0584-0280 7 CFR Part 225 Summer Food Service Program (SFSP)
- B. Burden Narrative: Estimate of the Information Collection Burden (narrative) for the 7 CFR Part 225 Summer Food Service Program (OMB# 0584-0280)
- C. Screenshot of FNS-418 from Food Program Reporting System
- D. Administration Guide for the Summer Food Service Program
- E. Public Comments and FNS Response
 - E.1 Public Comment#1

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F. Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.)

G. 7 CFR 225.7(d)(2)

H. 7 CFR 225.15(e)

I. 0584-0594 Food Program Reporting System Public Burden Statement

A. JUSTIFICATION

A1. Circumstances that make the collection of information necessary.

Explain the 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 a currently approved information collection. Section 13 of the Richard B. Russell National School Lunch Act (NSLA) 42 U.S.C. § 1758 (Attachment F), as amended, authorizes the Summer Food Service Program for Children (SFSP). The SFSP is directed toward children in low-income areas when school is not in session. It is locally operated by approved sponsors, which may include public or private non-profit school food authorities (SFAs), public or private non-profit residential summer camps, or units of local, municipal, county or State governments or other private non-profit organizations that develop a special summer or other school vacation program providing food service similar to that available to children during the school year under the National School Lunch Program (NSLP) (which is covered under OMB Number 0584-0006 and expires on September 30, 2019) and the School Breakfast Program (which is covered under OMB Number 0584-0012 and expires on April 30, 2022). This information collection is required to administer and operate this program in accordance with the NSLA.

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.

This information is required to administer and operate this program in accordance with the NSLA. SFSP is administered at the State level, thus entities that wish to operate the program as a sponsor must annually submit applications to their respective State agencies for approval. State agencies create their own application to obtain required data.

These applications may be crafted by referencing the FNS Administration Guide for the Summer Food Service Program (Attachment D), which outlines the information that State agencies are required to obtain.¹ Required application information includes identifying data, site location data, and information necessary for the State agency to determine whether the sponsor is capable of successfully operating the program. The State agency application process also captures information about the types and numbers of meals served, as well as information about site vendors.

Once a State agency approves an application, the agency will enter into an agreement with the sponsor for local level program operation and delivery of program benefits, in this case, meals, and services to eligible children. State agencies are required to keep a record of the application and agreement for three years, and must also report information about the identity of sponsors to FNS.

¹ The burden associated with reading or referencing handbooks had not been included in previous iterations of this ICR. However, as FNS continues to improve and emphasize program integrity, use of guidance materials will be included in the burden table so that FNS can have a more thorough accounting of the burdens associated with its programs.

Camps and some enrolled sites must also create their own applications to obtain eligibility information from their participants. Households receive and fill out those applications which are then submitted to the camps. Households must provide written consent for the camp sponsors to use or disclose information. The mechanisms by which the camps and enrolled sites collect these forms from the households varies based on camp or site resources (they may be submitted digitally or require a hardcopy submission).

While all SFSP meals are served at no charge, only meals that are served to eligible children and meet federal requirements may be claimed for reimbursement. In order to receive reimbursement for meals served, sponsors must submit a claim for reimbursement to the State agency within 60 days of the last day of operation. These claims contain the final meal count for the total amount of eligible meals that a sponsor served during the operating period. This data is required for sponsors to be reimbursed for the cost of meals served to eligible participants. Sponsors submit this data to State agencies electronically. The State agency must validate the meal claim forms to ensure their accuracy. State agencies must submit reimbursement claims using FNS-418 *Report of the Summer Food Service Program for Children* (OMB No. 0584-0594) (Attachment C) to FNS within 90 days of the final day of the operating period. Summer meals data are publically shared on the FNS public website at <https://www.fns.usda.gov/pd/child-nutrition-tables>. The general public can review the number of SFSP participants, meals served, and cash payments. This information is updated annually.

The burden associated with meal claim validation review process was zeroed out in the 2016 renewal of OMB 0584-0280; however, the requirement at 7 CFR 225.7(d)(2) for State agencies to conduct meal claim validation reviews remained. FNS is publishing a rule entitled *Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program* (OMB 0584-NEW) that will propose a new meal claim validation procedure. This new process prompted FNS to re-evaluate the burden associated with the existing process, under which information has been collected without OMB approval. As a result, FNS has re-introduced the meal claim validation burden calculation into the burden chart.

In terms of recordkeeping, State agencies must maintain records of meal claim validation reviews for three years. Sponsors' recordkeeping responsibilities include maintaining records that justify their program costs and eligibility for three years. Camps must maintain records of its hearing procedures for three years. The recordkeeping data must be maintained in order to prove program integrity if any of these entities are audited.

Program participation is supported by public disclosures. SFSP regulations at 7 CFR 225.15(e) require that sponsors annually announce the availability of free meals in the media serving the area from which it draws attendance. State agencies have the option to issue the announcement on behalf of the sponsor.

As mentioned above, State agencies use FNS-418 *Report of the Summer Food Service Program for Children* to submit reimbursement claims (Attachment C) to FNS. This

form and the reporting burden associated with it is approved under OMB# 0584-0594 Food Programs Reporting System (FPRS) expiration date 9/30/2019. The reporting burden is not included in the burden for this collection; however, any associated recordkeeping burden is included in this collection. A copy of FNS-418 is provided as an attachment to this collection for reference. The OMB Disclosure Statement (public burden statement) can be found in Attachment I. This statement is located on the home screen where the respondents can read it before they access FNS-418.

All of the information collected as described above are required to obtain or retain benefits. This is an ongoing collection. The number of State Agencies remained the same at 53, but the number of sponsors increased from 5,317 to 5,524. FNS made program adjustments to the number of households who are required to submit household information to better reflect the actual numbers of households who have to complete this information. New in this collection is the addition of reporting burden hours for State agencies and sponsors to review policy, instructions, guidance, and handbooks issued by FNS. This program adjustment was made in order to capture the true burden of operating SFSP. Finally, in this collection, FNS included the burden hours required for State agencies to review sponsors and sites to ensure compliance with Program regulations.

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. State agencies electronically submit the FNS-418 form through FNS' Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>. The FNS-418 is included in OMB# 0584-0594 Food Programs Reporting System. In addition, State agencies electronically submit to the FNS Regional Offices program Management and Administration Plans and site information.

Each State agency maintains its own website to communicate electronically with sponsors, camps, other sites, and households in their state, as well as systems to electronically collect applications for participation, site information, agreements, and Food Service Management Company contracts. While State agencies may utilize web-based systems for communication, the mechanism that camps and sponsors utilize can vary. Sponsors and camps may opt to collect hardcopies of their applications or consent forms. We estimate that these forms may account for 1% (2,920) of responses. Thus, out of the total 292,363 responses for this collection, FNS estimates that 289,110 (99%) will be collected 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 information collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and state administrative agency requirements. This SFSP is administered solely by FNS.

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.

Some local agencies and institutions meet the definition of “small organizations.” The information being requested or required has been held to the minimum required for the intended use. Although smaller State Agencies, Camps and Sponsors are involved in this data collection effort, they deliver the same program benefits and perform the same functions as larger ones. Thus, they maintain the same kinds of information on file. FNS estimates that 50% of sponsors or 2,762 sponsors ($5,524 \times .5=2,762$). Out of the total 63,942 respondents for this collection, FNS estimates that 2,752 (approximately 4.3%) of the respondents are considered 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.

This is an ongoing information collection that is required to obtain or retain benefits and is required by statute. The SFSP has a short operating period and State agencies and sponsors would lose operating funds if claims for reimbursement are not submitted in a timely manner. In order to receive reimbursement for eligible meals served, sponsors must submit

a claim for reimbursement within 60 days of the last day of operation and State agencies have 90 days to submit final claims from the last day of operation. The consequence of not collecting the information is the inability to proficiently operate the SFSP program.

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;**

This collection requires respondents to report information to the agency more often than quarterly. Sponsors must submit a claim for reimbursement within 60 days of the last day of operation and State agencies have 90 days to submit final claims from the last day of operation. This timeframe provides the State agencies with needed time to conduct the required meal claim validation reviews. State agencies must validate the claims in a timely manner to ensure that the claims are accurate, and claims must be validated before they are submitted for final reimbursement. Thus, if the reimbursement claims were submitted less frequently, sponsors may not receive timely reimbursements or may lose operating funds.

- **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 an 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.

A 60-day Federal Register Notice was published in the Federal Register on April 19, 2019 (Volume 84, Number 76, pages 16455-16456). The public comment period ended on June 18, 2019. In total, FNS received four comments. Of the four comments received, only one comment related to the proposed collection. The commenter shared that many forms, such as public release notifications, notifications from health departments, daily meals count forms, weekly meal forms, monthly meal forms, and production paperwork, are asking for the same information in a different way. The commenter also referenced information that pertains to the annual application process for sponsors to participate in

the SFSP. In addition, the commenter mentioned a software system, which would be a system used by sponsors or the State agency, not the Federal government. FNS, through rule making and policy guidance, has allowed flexibilities to streamline application and record keeping processes for the SFSP. However, State agencies and sponsors have discretion to develop their own tools for collecting required program information. FNS replied generally to the commenter that their comment will be taken into consideration and addressed in the information collection. FNS took the comment into consideration but upon review of the information collection and because the comment did not provide any recommendations, FNS has not made any modifications to burden or other aspects of this information collection at this time. However, FNS will continue to monitor how information is collected by those who administer the SFSP and will use the rule-making process to eliminate duplication where possible. Of the other three comments, one commenter stated that the ability to feed children, especially low income children during the summer when school is out of session is a very important part of school nutrition. The commenter noted that this program is easily audited, has less abuse and fraud as a result of the regulations, and is very successful when executed in a school setting. The commenter further noted that the counting system at open sites does not interfere or prevent children from eating but cautioned that the information asked should not become cumbersome and to avoid asking too many questions when collecting information. FNS replied generally to the commenter that their comment will be taken into consideration and addressed in the information collection. Since the commenter did not provide any suggestions concerning the practical utility, necessity or clarity of the information collection, nor provided any comments concerning the burden, FNS has made no

modifications in response to this comment. Since none of the comments were within the scope of this information collection, FNS has made no modifications as a result of these comments. The other two comments did not relate to the necessity, practical utility, quality, or clarity of the information collection, nor did they comment on the accuracy of the burden estimates or provide recommendations on minimizing the burden. Since none of these comments were within the scope of this information collection, FNS has made no modifications as a result of these comments.

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 form, and on data elements to be recorded, disclosed, or reported.

FNS consults with Regional offices regarding any proposed changes as the result of legislative, regulatory, or administrative changes. Regional offices are in daily contact with State agencies, which provide feedback on FNS processes and procedures for this information collection. Input on the information collection was also solicited at the USDA State agency meeting in December, 2018. Finally, the 60- day notice was announced to State agencies through Partnerweb announcements and at the National CACFP Sponsors Association conference in April, 2019 and the CACFP National Professionals Association conference in June, 2019.

FNS recently published the Child Nutrition Reducing Burden Study (OMB approved this study on April 6, 2018 under OMB# 0584-0613 Special Nutrition Programs Quick Response Surveys, which expires on February 28, 2021) where State agencies provided

feedback on FNS processes and procedures for this information collection. The research team conducted online surveys of State directors to identify challenges that States face related to program administration and reporting requirements for school meals programs. Survey topics and work group meeting topics included program standards, reporting, reviews, procurement, USDA guidance, and research participation. Within each topic area, States were asked about specific operational or reporting requirements and asked to identify those requirements that require the most effort and/or are the most time-consuming.

The surveys were administered in April and May 2018. A total of 52 States responded to the survey, including agencies for the 50 States; Washington, DC; and Guam.

Quantitative subgroup analyses were conducted according to State agency size. Open-ended question responses in the survey were analyzed using qualitative methodologies to identify recurrent themes. Overall, the census of State agencies allowed for a range of voices to be heard on the surveyed topics. Included as part of the survey was 1.) John Frassinelli (john.frassinelli@ct.gov), Bureau Chief, Bureau of Health/Nutrition, Family Services and Adult Education, Connecticut State Department of Education 2.) Angela Olige (Angela.Olige@TexasAgriculture.gov), Assistant Commissioner for Food and Nutrition, Texas Department of Agriculture and 3.) Cheryl Johnson (csjohnson@ksde.org), Director, Child Nutrition and Wellness, Kansas State Department of Education

This information is available to the public at:

<https://fns-prod.azureedge.net/sites/default/files/resource-files/CN-Reducing%20Burden.pdf>.

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

Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

No payment or gift 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.

The Department complies with the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. No confidential information is associated with this information collection. This ICR does not request any personally identifiable information nor does it contain any forms that require a Privacy Act Statement.

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. The statement should include:

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 information collection has an estimated 63,942 respondents (53 States Agencies, 5,524 Sponsors (60% Local and Tribal Governments and 40% non-profit and camps), and 58,365 Households), 292,363 annual responses, and 338,411 burden hours. Out of the total 338,411 burden hours, 2,068 hours are associated with existing requirements that have been collected without PRA approval. The requirement found at 7 CFR 225.7(d)(2) (Attachment G) that State agency must review sponsors and sites to ensure compliance with Program regulations and the requirements found at 7 CFR 225.15(e) (Attachment H) which allows State agencies to issue a media release on behalf of a sponsor had not previously been accounted for in this information collection. The attached Burden Table reflects the estimated burden (number of respondents, the frequency of response, an average time to respond, and annual burden hours) associated with this information collection for each type of respondent (Attachment A). A summary table follows:

| SUMMARY OF BURDEN (OMB #0584-0280) | |
|--------------------------------------|---------|
| TOTAL NO. RESPONDENTS | 63,942 |
| AVERAGE NO. RESPONSES PER RESPONDENT | 4.57 |
| TOTAL ANNUAL RESPONSES | 292,363 |
| AVERAGE HOURS PER RESPONSE | 1.157 |

| | |
|-------------------------------------|---------|
| BURDEN REQUESTED WITH SFSP REVISION | 338,411 |
| Current OMB Inventory | 197,062 |
| Change with this Revision | 141,349 |

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 2018 National Occupational and Wage Statistics, Occupational Group (25-0000) (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage (for education-related occupations) for functions performed by State agency and local education agency staff are estimated at \$27.22 per staff hour. The initial cost to the public is \$9,211,547 (338,411 hours × \$27.22 per hour). To account for a fully-loaded wage, an additional \$3,039,811 has been added to the initial cost (\$9,211,547 x .33). Therefore, the total cost to the public is \$12,251,358.

A13. Estimate of Other Total Annual Cost Burden.

Estimate of other total annual cost burden to respondents or record keepers. 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 items 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 or start-up costs or annual operation or 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. Also, provide a description of the method used to estimate the cost and any other expense that would not have been incurred without this collection of information.

Federal Cost

The Federal cost of collecting and processing data under Part 225, issuing Program regulations, guidance, and monitoring compliance with the regulations is presented below.

FNS used the following procedure to estimate this cost:

FNS identified functions performed by FNS Regional office (FNSRO) and National office staff that benefits the SFSP and obtained estimates of the total number of staff hours spent performing these functions. For National office and FNSRO, staff obtained estimates from personnel who perform the functions.

| FEDERAL COSTS OF SFSP - PERSONNEL | | | | |
|---|---------------------|-------------------------|----------------------------------|--------------------------|
| (1) | (2) | (3) | (4) | (5) |
| FUNCTION | DONE BY | TOTAL STAFF HOURS | SFSP ALLOCATION PERCENTAGE | PORTION TO SFSP (3X4) |
| Professional Assistance to State agencies | FNS Regional office | 22,880 hours | 20% | 4,576 hours |
| Drafting/ Clearing Regulations | National office | 14,560 hours | 40% | 5,824 hours |
| Policy Development Guidance | National office | 14,560 hours | 40% | 5,824 hours |
| TOTAL | | | | 16,224 |

Using the 2019 Federal Wage Salary Tables, we estimated the salary rate at \$41.54 per hour (the average hourly salary for a GS 11/12 which is the grade level of staff who performs these functions). We used the pay table for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area and used the step 5 hourly wage to average the salary for 11 and 12 [(37.79+ 45.29)/2= 41.54]. Our computations are:

| | <u>FEDERAL SALARIES</u> |
|--|----------------------------|
| Salaries (16,224 hours @ \$41.54) | \$ 673,944.96 |
| 10 % for Administrative overhead | <u>\$ 67,394.50</u> |
| <u>Account for fully-loaded wage rates (33%)</u> | <u>\$222,401.83</u> |
| Federal Cost | <u>\$963,741.29</u> |

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 the currently approved collection. The information collection is currently approved with 197,062 burden hours and 794,506 responses. For this renewal, FNS estimates a total burden hour of 338,411 hours and 292,363 annual responses. This renewal will add 141,349 burden hours (+2,068 burden hours in program changes and +139,281 burden hours due to adjustment). It also reduces an overall total of 502,143 responses from the collection; while it adds 24,817 responses due to program changes, this increase is offset by a reduction of 526,960 responses due to an adjustment (reductions in the number of participating households and other changes). FNS revaluated the number of households that are actually required to fill out household income applications. Based on the data from the National Data Bank, ninety three percent of SFSP sites are open sites. Therefore, a majority of households do not need to complete any forms to receive free meals. FNS made adjustments only account for the number of households who are required to read instructions and provide household eligibility information. Using the average daily attendance data from the National Data Bank, FNS

estimates that 58,365 households would need to provide camps with individual household information. Finally, as a result, this also reduces the reporting burden for camp sponsors by approximately 82 hours, from 165 to 83 hours. After reevaluating the burden of existing program tasks, the reporting burden increased by 176,896 hours (+2,055 burden hours due to program change and + 174,841 burden hours due to adjustment), the recordkeeping burden decreased by 35, 612 hours (-35,612 burden hours due to adjustments), and the public notification burden increased by 65 burden hours (+13 burden hours due to program changes and +52 hours due to adjustments) since the last renewal.

In this renewal, FNS separated one reporting requirement into two to reflect the actual reporting burden of the program, as some requirements pertain only to new sponsors or sponsors who have significant operational programs. The burden associated with the State agency reviewing sponsors and sites to ensure compliance with Program regulations, and validating 100% of claims for sponsors under review under 7 CFR 225.7(d)(2) (2,055 burden hours) was not previously included in OMB 0584-0280. In addition, FNS also included a public disclosure requirement for State agencies per policy guidance under 7 CFR 225.15(e), which allows State agencies to issue media releases on behalf of the sponsor (13 burden hours). The specific burden changes for this information collection can be found in Attachment B: Burden Narrative.

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 use.

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 related 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.