

Attachment B. Estimate of the Information Collection Burden for OMB# 0584-0006 National School Lunch Program

**Estimate of the Information Collection Burden for the
National School Lunch Program (OMB #0584-0006)**

This document explains the calculation of the information collection burden for the National School Lunch Program (NSLP) - 7 CFR Part 210, OMB Control #0584-0006.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Section 210.18(i)(3) requires SAs to provide written notification to school food authorities (SFAs) of review findings, corrective actions, deadlines for completion, and potential fiscal action with right to appeal. FNS estimates there are 56 SAs that will each file 113 reports annually for a total of 6,328 responses ($56 \times 113 = 6,328$). The estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 50,624 ($6,328 \times 8 = 50,624$). **This burden is reduced by 2,240 hours, from 52,864 to 50,624 hours, as an adjustment due to a decrease in the number of participating SFAs.**
2. Section 210.19(f) requires the SA to provide the Child and Adult Care Food Program (CACFP) SA with a list of all NSLP schools in which at least 50% of the children are eligible for free or reduced price meals. FNS estimates that 56 SAs will each file 1 report annually for an estimated number of responses of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per response is 2 hours resulting in estimated total annual burden hours of 112 ($56 \times 2 = 112$). There is no change in burden.
3. Section 210.20(a)(7) requires SAs to report to FNS the results of schools' compliance with the food safety inspection requirement (i.e., number of inspections). FNS estimates 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 1.5 hours resulting in an estimated total annual burden hours of 84 ($56 \times 1.5 = 84$). There is no change in burden.
4. **Section 210.5(d)(2)(ii) requires that SAs submit a quarterly report to FNS detailing the disbursement of performance based reimbursement to SFAs. FNS estimates that there are 56 SAs that will each file 4 reports annually for a total of 224 responses ($56 \times 4 = 224$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 56 ($224 \times 0.25 = 56$). The requirement for the performance-based reimbursement reporting is an existing requirement that had been previously approved but the burden was mistakenly removed during the 2016 renewal of the NSLP information collection (OMB# 0584-0006). Adding this requirement back into the collection will add 56 hours to OMB's inventory due to a program change (existing information collection in use without OMB approval).**
5. **Sections 210.18 (c-h) require the SA to complete Administrative Reviews. FNS estimates there are 56 SAs that will each file approximately 113 reports annually for a total of 6,347 responses ($56 \times 113.339 = 6,347$). The estimated average number of**

burden hours per response is 47.5 hours resulting in an estimated total annual burden hours of 301,482 (6,347 x 47.5 = 301,482). The requirement to complete the documentation used in the administrative review has been a regulatory requirement since 2016; however, the burden associated with these reviews has not been included in the burden for OMB# 0584-0006. This will add 301,482 hours to OMB's inventory due to a program change (existing information collection in use without OMB approval).

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs)

1. Section 210.9(b)(21) requires SFAs to provide the SA with a list of all schools with at least 50% of enrolled children determined eligible for free or reduced price meals as of the last day of October and, upon request, the attendance boundaries for those schools. FNS estimates 19,019 SFAs will each file 1.25 report annually for a total of 23,774 responses (19,019 x 1.25 = 23,774). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 5,943 (23,774 x 0.25 = 5,943). **This burden is reduced by 251 hours, from 6,194 to 5,943 hours, as an adjustment due to a decrease in the number of participating SFAs.**
2. Section 210.9(c)(7) requires SFAs to conduct reviews of each afterschool care program that participates in the NSLP. FNS estimates 6,314 SFAs will each file 2 responses annually for a total of 12,628 responses (6,314 x 2 = 12,628). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 3,157 (12,628 x 0.25 = 3,157). **This burden is increased by 2,916 hours, from 241 to 3,157 hours, as an adjustment due to increase in the number of SFA participating in afterschool care programs.**
3. Sections 210.15(a)(1) and 210.8(b)&(c) require SFAs to submit to the SA monthly claims for reimbursement and numbers of enrolled children by category for the month of October. FNS estimates 19,019 SFAs will each file 10.15 reports annually for a total of 193,043 responses (19,019 x 10.15 = 193,043). The estimated average number of burden hours per response is 1 hour resulting in an estimated total annual burden hours of 193,043 (193,043 x 1 = 193,043). **This burden is reduced by 8,150 hours, from 201,193 to 193,043 hours, as an adjustment due to a decrease in the number of participating SFAs.**
4. Sections 210.15(a)(2)&(4), 210.9(a)&(b), and 210.7(d)(2) require SFAs to submit an application to the SA for a school to operate the Program, specify commodity preference, and enter into an agreement with the SA, including an annual attestation of compliance with meal pattern and nutrition requirements. FNS estimates there are 19,019 SFAs that will each file 1 report annually for a total of 19,019 responses (19,019 x 1 = 19,019). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in estimated total annual burden hours of 4,755 (19,019 x 0.25 = 4,755). **This burden is reduced by 201 hours, from 4,956 to 4,755 hours, as an adjustment due to a decrease in the number of participating SFAs.**
5. Sections 210.15(a)(3) and 210.18(j)(2) require SFAs to submit to the SA a written response to reviews documenting corrective action taken for Program deficiencies. FNS estimates 6,340 SFAs will each file 1 report annually for a total of 6,340 responses (6,340 X 1 = 6,340). The

estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 50,720 ($6,340 \times 8 = 50,720$). **This burden is reduced by 2,136 hours, from 52,856 to 50,720 hours, as an adjustment due to a decrease in the number of participating SFAs.**

6. Section 210.15(a)(7) requires SFAs to report to the SA the number of food safety inspections obtained by each school. FNS estimates 19,019 SFAs will each file 1 report annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 30 minutes (0.50 hours) resulting in an estimated total annual burden hours of 9,510 ($19,019 \times 0.5 = 9,510$). **This burden is reduced by 402 hours, from 9,911 to 9,510 hours, as an adjustment due to a decrease in the number of participating SFAs.**
7. Sections 210.15(a)(8) and 210.14(e)(7) require SFAs to report to the SA the prices of paid lunches for each school. FNS estimates 19,019 SFAs will each file 1 report annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). **This burden is reduced by 201 hours, from 4,956 to 4,755 hours, as an adjustment due to a decrease in the number of participating SFAs.**

AFFECTED PUBLIC: SCHOOLS

1. Section 210.13(b) requires schools to post the most recent food safety inspection and provide a copy upon request. FNS estimates that 96,860 schools will each file 2 reports annually for a total estimated number of responses of 193,720 ($96,860 \times 2 = 193,720$). The estimated average number of burden hours per response is 6 minutes (0.10 hours) resulting in an estimated total annual burden hours of 19,372 ($193,720 \times 0.1 = 19,372$). **This burden is reduced by 894 hours, from 20,266 to 19,372 hours, as an adjustment due to a decrease in the number of participating schools.**

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. Section 210.18(h)(2)(iv) requires each SA to ensure that the LEA and SFA comply with the nutrition standards for all competitive food and maintain records documenting compliance. FNS estimates that 56 SAs will each maintain 113 records annually for a total estimated number of records of 6,328 ($56 \times 113 = 6,328$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 1,582 ($6,328 \times 0.25 = 1,582$). **This burden is reduced by 70 hours, from 1,652 to 1,582 hours, as an adjustment due to a decrease in the number of participating SFAs.**
2. Sections 210.20(b)(1)&(2), 210.23(c), and 210.5 require the SA to maintain accounting records and source documents to control the receipt, custody, and disbursement of Federal NSLP funds, including documentation to support all SFA claims paid by the SA (FNS-10). FNS estimates that 56 SAs will each file 340 reports annually for a total estimated number of records of 19,040 ($56 \times 340 = 19,040$). The estimated average number of burden hours per

record is 3 hours resulting in an estimated total annual burden hours of 57,120 (19,040 x 3 =57,120). **This burden is reduced by 2,352 hours, from 59,472 to 57,120 hours, as an adjustment due to a decrease in the number of participating SFAs.**

3. Sections 210.20(b)(3) and 210.17(g)&(h) require the SA to maintain documentation to support the amount of State funds reported (FNS-13) for State revenue matching requirements. FNS estimates that 56 SAs will each file 1 report annually for a total estimated number of records of 56 (56 x 1 = 56). The estimated average number of burden hours per record is 1 hour resulting in an estimated total annual burden hours of 56 (56 x 1 = 56). There is no change in burden.
4. Sections 210.20(b)(6), 210.18(o)(f)(k)(l)(m), and 210.23(c) require the SA to maintain records of all reviews and audits (including Program violations, corrective action, fiscal action, and withholding of payments). FNS estimates that there are 56 SAs that will each file 113 records annually for a total of 6,328 records (56 X 113 = 6,328). The estimated average number of burden hours per record is 8.00214 hours resulting in an estimated total annual burden hours of 50,638 hours (6,328 x 8.00214 = 50,638). **This burden is reduced by 2,240 hours, from 52,878 to 50,638 hours, as an adjustment due to a decrease in the number of participating SFAs.**
5. Sections 210.20(b)(7), 210.19(c), and 210.18(o) require the SA to document fiscal action taken to disallow improper claims submitted by SFAs, as determined through claims processing, reviews, and audits. FNS estimates that there are 56 SAs that will each file 113 records annually for a total of 6,328 records (56 x 113 = 6,328). The estimated average number of burden hours per record is 30 minutes (0.50 hours) resulting in an estimated total annual burden hours of 3,164 hours (6,328 x 0.5 = 3,164). **This burden is reduced by 140 hours, from 3,304 to 3,164 hours, as an adjustment due to a decrease in the number of participating SFAs.**
6. **Sections 210.18 (c-h) require the SA to maintain documentation used to conduct Administrative Review. FNS estimates there are 56 SAs that will each file approximately 113 reports annually for a total of 6,347 responses (56 x 113.339 = 6,347). The estimated average number of burden hours per response is 30 minutes (0.50 hours)s resulting in an estimated total annual burden hours of 3,173 (6,347 x 0.5 = 3,173). The requirement to maintain the documentation for the administrative review has been a regulatory requirement since 2016; however, the burden associated with this activity has not been included in the burden for OMB# 0584-0006. This will add 3,173 hours to OMB's inventory due to a program change (existing information collection in use without OMB approval).**
7. Sections 210.20(b)(10) and 210.19(b) require the SA to maintain records on the annual food preference survey of SFAs and prepare and forward to the SA information on schools eligible to receive USDA donated foods. FNS estimates that 56 SAs will each file 1 report annually for an estimated number of responses of 56 (56 x 1 = 56). The estimated average number of burden hours per response is 3 hours resulting in an estimated total annual burden hours of 168 (56 x 3 = 168). There is no change in burden.
8. Section 210.20(b)(11) requires SAs to maintain records supplied by SFAs of food safety inspections obtained by schools. FNS estimates that 56 SAs will each file 340 reports

annually for a total estimated number of responses of 19,040 ($56 \times 340 = 19,040$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in estimated total annual burden hours of 4,760 ($19,040 \times 0.25 = 4,760$). **This burden is reduced by 196 hours, from 4,956 to 4,760 hours, as an adjustment due to a decrease in the number of participating SFAs.**

9. Sections 210.20(b)(12) and 210.14(e)(7) require SAs to maintain records of paid reimbursable lunch prices obtained from SFAs (FNS-828). FNS estimates that 56 SAs will each file 340 reports annually for a total estimated number of responses of 19,040 ($56 \times 340 = 19,040$). The estimated average number of burden hours per record is 12 minutes (0.2 hours) resulting in estimated total annual burden hours of 3,808 ($19,040 \times 0.2 = 3,808$). **This burden is reduced by 157 hours, from 3,965 to 3,808 hours, as an adjustment due to a decrease in the number of participating SFAs.**
10. Section 210.20(b)(14) requires SAs to maintain records to demonstrate compliance with the professional standards for State directors of school nutrition programs. FNS estimates that 56 State agencies will each file 1 record annually for a total estimated number records of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 14 ($56 \times .25 = 14$). There is no change in burden.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs) and LOCAL EDUCATION AGENCIES (LEAs)

1. Section 210.9(b)(19) requires SFAs to maintain names of children currently approved for free meals through direct certification with supporting documentation. FNS estimates that 19,019 SFAs will each file 4 reports annually for a total estimated number of records of 76,076 ($19,019 \times 4 = 76,076$). The estimated average number of burden hours per record is 39 minutes (0.65 hours) resulting in an estimated total annual burden hours of 49,449 ($76,076 \times 0.65 = 49,449$). **This burden is reduced by 2,088 hours, from 51,537 to 49,449 hours, as an adjustment due to a decrease in the number of participating SFAs.**
2. Section 210.11(b)(2) requires LEAs and SFAs to be responsible for maintaining records documenting compliance with the nutrition standards for all competitive food available for sale to students. FNS estimates that 19,019 SFAs will each file 1 record annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 20 hours resulting in an estimated total annual burden hours of 380,380 ($19,019 \times 20 = 380,380$). **This burden is reduced by 16,060 hours, from 396,440 to 380,380 hours, as an adjustment due to a decrease in the number of participating SFAs.**
3. Sections 210.15(b)(1) and 210.8(a)(5) require SFAs to maintain documentation of participation data by school, each month's Claim for Reimbursement, and all data used in the claims review process. FNS estimates that 19,019 SFAs will each file 10 records annually for a total estimated number of records of 190,190 ($19,019 \times 10 = 190,190$). The estimated average number of burden hours per record is 5 hours resulting in an estimated total annual burden hours of 950,950 ($190,190 \times 5 = 950,950$). **This burden is reduced by 40,150 hours,**

from 991,100 to 950,950 hours, as an adjustment due to a decrease in the number of participating SFAs.

4. Sections 210.15(b)(2) and 210.7(d)(2) require SFAs to maintain production and menu records and documentation to support performance-based cash assistance and the attestation of compliance. FNS estimates that 19,019 SFAs that will each file 1 record annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). **This burden is reduced by 201 hours, from 4,956 to 4,755 hours, as an adjustment due to a decrease in the number of participating SFAs.**
5. Sections 210.15(b)(4) and 210.9(b)(18&20) require SFAs to maintain currently approved and denied applications for free and reduced priced meals. FNS estimates that 19,019 SFAs will each file 1 record annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimate average number of burden hours per record is 2 hours and 40 minutes (2.66 hours) resulting in estimated total annual burden hours of 50,591 ($19,019 \times 2.66 = 50,591$). **This burden is reduced by 2,136 hours, from 52,727 to 50,591 hours, as an adjustment due to a decrease in the number of participating SFAs.**
6. Sections 210.15(b)(6) and 210.14(e) require SFAs to maintain records to document compliance with reporting lunch prices to the SA. FNS estimates that 19,019 SFAs will each file 1 reports annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 5 hours resulting in an estimated total annual burden hours of 95,095 ($19,019 \times 5 = 95,095$). **This burden is reduced by 4,015 hours, from 99,110 to 95,095 hours, as an adjustment due to a decrease in the number of participating SFAs.**
7. Sections 210.15(b)(7) and 210.14(f) require SFAs to maintain records to document compliance with revenue from nonprogram foods. FNS estimates that 19,019 SFAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 10 hours resulting in an estimated total annual burden hours of 190,190 ($19,019 \times 10 = 190,190$). **This burden is reduced by 8,030 hours, from 198,220 to 190,190 hours, as an adjustment due to a decrease in the number of participating SFAs.**
8. Sections 210.15(b)(8) and 210.30(g) require SFAs to maintain records to demonstrate compliance with the professional standards for school nutrition program directors, managers and personnel. FNS estimates that 19,019 SFAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). **This burden is reduced by 200 hours, from 4,955 to 4,755 hours, as an adjustment due to a decrease in the number of participating SFAs.**
9. Sections 210.15(b)(9) and 210.30(f) require SFAs/LEAs to maintain records documenting compliance with the local school wellness policy requirements. FNS estimates that 19,019 SFAs/LEAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 15

minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). **This burden is reduced by 200 hours, from 4,955 to 4,755 hours, as an adjustment due to a decrease in the number of participating SFAs.**

AFFECTED PUBLIC: SCHOOLS

1. Section 210.10(m) requires schools to maintain written statements signed by a licensed physician of the need for substitutions recommending alternate foods unless otherwise exempted by FNS. FNS estimates that 29,058 schools will each file 1 record annually for a total estimated number of records of 29,058 ($29,058 \times 1 = 29,058$). The estimated average number of burden hours per record is 5 minutes (0.08 hours) resulting in an estimated total annual burden hours of 2,325 ($29,058 \times 0.08 = 2,325$). **This burden is reduced by 107 hours, from 2,432 to 2,325 hours, as an adjustment due to a decrease in the number of participating schools.**
2. Section 210.11(b)(2) requires that organizations responsible for food service at various venues in schools maintain records. FNS estimates that 96,860 schools will each file 1 record annually for a total estimated number of records of 96,860 ($96,860 \times 1 = 96,860$). The estimated average number of burden hours per response is 30 minutes (0.5 hours) resulting in estimated total annual burden hours of 48,430 ($96,860 \times 0.5 = 48,430$). **This burden is reduced by 2,236 hours, from 50,666 to 48,430 hours, as an adjustment due to a decrease in the number of participating schools.**
3. Section 210.15(b)(1) requires SFAs or schools to maintain records of participation data by school in support of the Claim for Reimbursement. FNS estimates that 96,860 schools will each file 180 reports annually for a total estimated number of responses of 17,434,800 ($96,860 \times 180 = 17,434,800$). The estimated average number of burden hours per response is 9 minutes (.15 hours) resulting in estimated total annual burden hours of 2,615,220 ($17,434,800 \times 0.15 = 2,615,220$). **This burden is reduced by 120,744 hours, from 2,735,964 to 2,615,220 hours, as an adjustment due to a decrease in the number of participating schools.**
4. Sections 210.15(b)(2) (3) and 210.10(a)(3) require schools or SFAs to maintain production, menu, and the latest nutritional analysis records to show that meals meet requirements. FNS estimates that 96,860 schools will each file 180 reports annually for a total estimated number of responses of 17,434,800 ($96,860 \times 180 = 17,434,800$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in estimated total annual burden hours of 4,358,700 ($17,434,800 \times 0.25 = 4,358,700$). **This burden is reduced by 201,240 hours, from 4,559,940 to 4,358,700 hours, as an adjustment due to a decrease in the number of participating schools.**
5. Sections 210.15(b)(5) and 210.13(b)&(c) require schools to maintain temperature records for food safety program and records from the most recent food safety inspection. FNS estimates that 96,860 schools will each file 120 reports annually for a total estimated number of responses of 11,623,200 ($96,860 \times 120 = 11,623,200$). The estimated average number of burden hours per response is 1 minute (0.02 hours) resulting in estimated total annual burden hours of 232,464 ($11,623,200 \times 0.02 = 232,464$). **This burden is reduced by 10,733 hours, from 243,197 to 232,464 hours, as an adjustment due to a decrease in the number of participating schools.**

PUBLIC NOTIFICATION REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Section 210.18(m)(1) requires SAs to make the most recent final administrative review results available to the public in an easily accessible manner (by posting a summary to the SA website and make a copy available upon request). FNS estimates there are 56 SAs that will each file 113 reports annually for a total of 6,328 responses ($56 \times 113 = 6,328$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 1,582 ($6,328 \times 0.25 = 1582$). **This burden is reduced by 154 hours, from 1,736 to 1,582 hours, as an adjustment due to a decrease in the number of participating schools.**

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs) and LOCAL EDUCATION AGENCIES (LEAs)

1. **Section 210.31(a) and 210.31(c)(5) requires that each LEA must establish a local school wellness policy for all schools participating in school meal programs. This was a one-time burden, averaged over three years, that is being removed from this collection because all of the LEAs have established such policies. The removal of this requirement will reduce the burden by 99,110 hours, from 99,110 to 0 hours, as an adjustment.**
2. Section 210.31(d)(2) states that each LEA is required to inform the public annually about the local school wellness policy content and implementation and make any updates available to the public. FNS estimates that there are 19,019 LEAs that will each submit 1 public disclosure annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 1 hour resulting in an estimated total burden hours of 19,019 ($19,019 \times 1 = 19,019$). **This burden is reduced by 803 hours, from 19,822 to 19,019 hours, as an adjustment due to a decrease in the number of participating SFAs.**
3. Section 210.31(d)(3), (e)(2), and (e)(3) state that each LEA is required to conduct triennial assessments and make results available to the public and make updates and modifications to policies as needed. FNS estimates that there are 6,340 LEAs ($19,019/3$) that will each submit 1 public disclosure annually, since this assessment occurs once every three years, for a total of 6,340 responses. The estimated average number of burden hours per response is 5 hours resulting in an estimated total burden hours of 31,700 ($6,340 \times 5 = 31,700$). **This burden is reduced by 1,335 hours, from 33,035 to 31,700 hours, as an adjustment due to a decrease in the number of participating SFAs.**