

**SUPPORTING STATEMENT FOR
OMB CONTROL NUMBER 0584-0006
7 CFR PART 210 NATIONAL SCHOOL LUNCH PROGRAM
REVISION OF A CURRENTLY APPROVED COLLECTION**

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- A. Burden Chart for 0584-0006 7 CFR Part 210 National School Lunch Program
- B. Estimate of the Information Collection Burden for OMB# 0584-0006 National School Lunch Program
- C. Form FNS-640 Administrative Review Data Report

- D. OMB# 0584-0594 Food Programs Reporting System (FPRS) Home Screen with OMB Information and Public Burden Statement
- E. Form FNS-10 Report of School Operations (OMB# 0584-0594)
- F. Form FNS-13 Annual Report of State Revenue Matching (OMB# 0584-0594)
- G. Form FNS-828 School Food Authority Paid Lunch Price Report (OMB# 0584-0594)
- H. Form FNS-777 Financial Status Report (OMB# 0584-0594)
- I. Child Nutrition Act of 1966 (42 U.S.C. 1779)
- J. Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.)
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- M. Public Comment #1
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- Q. Response to Public Comment #4
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- T. Administrative Review Manual
 - 1. Off-site Assessment Tool
 - 2. On-site Assessment Tool
 - 3. Site Selection Worksheet
 - 4. Statistical Sample Generator
 - 5. Meal Compliance Risk Assessment Tool
 - 6. Dietary Specifications Assessment Tool
 - 7. Nutrient Analysis and Validation Checklist

8. Nutrient Analysis Protocols
9. Resource Management Comprehensive Review Form
10. Resource Management Risk Indicator Tool
11. Fiscal Action Workbook
12. Non-reimbursable Meal Allocation Form
13. School Data and Meal Pattern Error Form (S-1)
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15. Eligibility Certification and Benefit Issuance Error Worksheet (SFA-1)
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20. Seamless Summer Option School Data and Meal Pattern Error Form (SSO S-1)
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22. Supplemental Seamless Summer Option Administrative Review Form
23. Supplemental Afterschool Snacks Administrative Review Form
24. Supplemental Special Milk Program Administrative Review Form
25. Infant and Pre-K Meal Pattern On-Site Validation Checklist

A. JUSTIFICATION

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.

This is a revision of the currently approved information collection for the National School Lunch Program – Part 210, associated with OMB control number 0584-0006. Section 10 of the Child Nutrition Act of 1966 (42 U.S.C. 1779) (Attachment I) requires the Secretary of Agriculture to prescribe such regulations as deemed necessary to carry out this Act and the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1751 et seq.)(Attachment J). The NSLA, as amended, authorizes the National School Lunch Program (NSLP) to safeguard the health and well-being of the Nation's children and provide free or reduced-price school lunches to eligible students through subsidies to schools. As required, the Secretary of Agriculture issued 7 CFR Part 210, which sets forth policies and procedures for the administration and operation of the NSLP. The United States Department of Agriculture (USDA) provides States with general and special cash assistance and donations of foods to assist schools in serving nutritious lunches to children each school day. Participating schools must serve lunches that are nutritionally adequate, and maintain menu and production records to demonstrate compliance with the meal requirements. 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 the actual use the agency has made of the information received from the current collection.

This information is required to administer and operate this program in accordance with the NSLA. State agencies, school food authorities (SFAs)/local educational agencies (LEAs), and schools are required to meet reporting, recordkeeping, and public notification requirements in order to obtain/retain benefits. These requirements are explained in the “Estimate of the Information Collection Burden for the National School Lunch Program (OMB control # 0584-0006)” located in Attachment B. This renewal includes the addition of two existing information collection requirements – administrative review cycle and reporting on performance-based reimbursement – which FNS has been collecting without OMB approval (Attachment K and Attachment L). The requirement that State agencies submit a quarterly report to USDA detailing SFAs certified to receive the performance-based reimbursement (§210.5(d)(2)(ii)) was previously included in the OMB# 0584-0006 information collection, but was mistakenly removed during the 2016 renewal of that information collection. This renewal adds reporting and recordkeeping burden for the burden hours needed to conduct and maintain the administrative review. Current statutory and regulatory provisions require State agencies to conduct an administrative review of each SFA participating in the school meals programs at least once during a 3-year review cycle. This comprehensive administrative review, outlined at 7 C.F.R. 210.18, monitors compliance with eligibility, meal counting and claiming, and meal pattern

requirements among additional Program requirements. The administrative review burden from the 2016 rulemaking under the “Administrative Reviews in the School Nutrition Programs” Final Rule (RIN 0584–AE30) has been a regulatory requirement since 2016 but has not previously been approved by OMB; FNS is developing and finalizing forms and tools that assist State agencies with their oversight responsibilities and reporting and recordkeeping requirements. The administrative review consist of an off-site and on –site review that State agencies complete in order to monitor school food authorities compliance with Program requirements. State agencies use an FNS developed manual, forms, and tools to carry out this review. These materials consist of review modules that focus on various aspects of Program requirements. The burden for conducting oversight of the programs through the administrative review consists of the time it takes for the State agency to conduct the off-site portion of the review which includes scheduling of the review and the completion of the Off-site Assessment, Resource Management Risk Indicator, and Site Selection Tools. This burden also consists of the State agency conducting the on-site review of critical and general areas of the review and any additional applicable forms. FNS has attached the Administrative Review Manual to show the procedures State agencies follow during reviews (Attachment T). The forms that are used in the Administrative Review process are also included (Attachments T1 through T25). In addition to required review activities, there are statutory and regulatory provisions that require State agencies to report on the findings from the administrative reviews through the FNS- 640. The burden associated with completing the FNS-640 can be found in OMB# 0584-0594 Food Programs Reporting System (FPRS), expiration date 9/30/2019. This collection is under review at OMB and the expiration date is being renewed monthly until OMB concludes their review. The administrative review is a

required oversight process used, regardless of the reporting requirements of the FNS-640, therefore all burden apart from the burden to fill out the FNS-640 is included in this information collection. In addition, this renewal also account for changes in the number of participating SFAs and schools.

The Program is administered at the State agency and SFA levels and the Act requires that State agencies and SFAs maintain accounts and records as may be necessary to enable FNS to determine whether the program is in compliance with this Act and the regulations. State agencies are required to report program data to FNS using FNS forms. Some of this reporting burden is captured on forms that are completed and submitted via the Food Programs Reporting System (FPRS), which is approved under the information collection for the Food Programs Reporting System (FPRS), OMB Control #0584-0594. This reporting burden is not duplicated in this information collection; however, any recordkeeping burden associated with these forms is still maintained in this collection. Copies of these forms are provided as part of this ICR for reference purposes only. FNS publically shares data on total number of participants, the number of lunches served, the amount of cash payments made to States, and the commodity costs of each State. Unless otherwise noted, all other data is not shared outside of FNS.

State Agencies

State agencies have reporting, recordkeeping, and public notification requirements they must meet in order to administer the NSLP. The information collected is used to ensure FNS can properly monitor State agency and SFA compliance and to inform USDA policy making.

State agencies must review each SFA on site every three years. This generates reporting and recordkeeping requirements to maintain documentation of: information used to conduct reviews, LEA/SFA compliance with nutrition standards for competitive foods, records of the results of all reviews (including Program violations, corrective action, fiscal action and withholding of payments) (Attachment C Form FNS-640 Administrative Review Data Report); and fiscal action taken to disallow improper claims submitted by SFAs, as determined through claims processing, reviews, and USDA audits. These reviews also include a reporting requirement for State agencies. State agencies must notify SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with grounds and right to appeal. Additionally, State agencies are required to make the most recent final administrative review results available to the public in an easily accessible manner. This public notification requirement requires state agencies to publish results for each SFA every three years. State agencies must also annually report to FNS on schools' compliance with the food safety inspections requirements.

State agencies receive occasional management evaluations from FNS. For these reviews,

State agencies must annually maintain:

- records and source documents to control the receipt, custody, and disbursement of Federal NSLP funds;
- documentation supporting all SFA claims paid by the State agency (Attachment E Form FNS-10 Report of School Operations, OMB# 0584-0594) and the reported amount of State funds used for State revenue matching requirements (Attachment F Form FNS-13

Annual Report of State Revenue Matching, OMB# 0584-0594);

- records from SFAs of food safety inspections obtained by school;
- records of paid reimbursable lunch prices obtained from SFAs (Attachment G Form FNS-828 School Food Authority Paid Lunch Price Report, OMB# 0584-0594);
- records on schools eligible to receive USDA donated foods; and
- documentation of compliance with professional standards for State directors of School Nutrition Programs.

State agencies also are required to report a list of all NSLP schools with at least 50% or more children eligible for free or reduced price meals by February 1 each year to the State agency that administers the Child and Adult Care Food Program (CACFP) in their State.

School Food Authorities/Local Educational Agencies

SFAs must meet reporting, recordkeeping, and public notification requirements in order to participate in the NSLP and to receive timely reimbursement.

SFAs are required annually to report to their State agency:

- the number of safety inspections obtained by each school;
- a list of all schools with at least 50% free or reduced price enrolled children (and the attendance boundaries for those schools upon request of a CACFP sponsor of homes);
- copies of their application, agreement, Free and Reduced Price Policy Statement, commodity preference, and annual certifications;
- the results of their review of NSLP afterschool care programs; and

- prices of paid lunches for each school.

Additionally, SFAs must submit monthly claims for reimbursement and eligibility data for enrolled children for October to their State agency. SFAs also must submit to their State agencies a written response to reviews documenting corrective action for Program deficiencies. For all requirements listed above, data is primarily submitted through electronic State systems, though there is a small amount of non-electronic submissions that are sent via email or flash drive or facsimile. The data collected by State agencies is used for State agency submissions to FNS, so the forms used by State agencies contain many of the same elements used in the FNS-10, FNS-640, FNS-777, FNS-828.

SFAs are required to annually maintain certain records so that State agencies may review them for compliance during an administrative review. These recordkeeping requirements include:

- documentation of children who are directly certified (maintained quarterly);
- compliance with nutrition standards for all competitive food for sale to students;
- participation data by school to support monthly Claim for Reimbursement and data used in the claims review process (maintained each month the NSLP is operating);
- documentation to support performance-based reimbursement and the attestation of compliance;
- files of school meal applications;
- calculations of average paid lunch prices and adjustments;
- documentation showing revenue from sale of nonprogram foods accrues to the nonprofit school food service account and is compliant with requirements;

- documentation of compliance with professional standards for school nutrition directors, managers, and personnel; and
- records to document compliance with the local school wellness policy requirements.

For all requirements listed above, data is primarily submitted through electronic State systems, though there is a small amount of non-electronic submissions that are sent via email, flash drive, or facsimile.

Local educational agencies (LEAs) have annual public notification requirements which are necessary to inform the public about the content and implementation of the local school wellness policy and any updates. LEAs must conduct triennial assessments of schools' compliance with the local school wellness policy and inform the public about progress.

Schools

Schools must meet certain requirements to participate in the NSLP and in order to receive reimbursement. This data is collected so that it may be reviewed by State agencies during administrative reviews and so that timely reimbursement can be provided.

Twice a year, schools must post their most recent food safety inspection and they must provide a copy upon request. Schools also maintain:

- records of written statements signed by a licensed physician of the need for substitutions and recommending alternate foods;
- records related to competitive foods;

- documentation of participation data by school to support the Claim for Reimbursement;
- food safety records; and
- records from the most recent food safety inspection.

These records are inspected during on-site administrative reviews.

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, and for other purposes. All 56 State agencies that administer the NSLP submit some Program and financial data to FNS electronically via the Food Programs Reporting System (FPRS), at <https://www.FPRS.usda.gov>, using the following forms, which are included in the FPRS information collection, OMB control # 0584-0594:

- FNS-10, Report of School Program Operations;
- FNS-13 State Revenue Matching Requirement Report;
- FNS-640 Administrative Review Report
- FNS-777, Financial Status Report; and

- FNS-828, School Food Authority Paid Lunch Price Report.

State agencies collect participation and meal count data from SFAs via their own electronic systems. Minimal non-electronic submissions are sent via email, flash drive, or facsimile, such as providing records for Management Evaluations to FNS upon request. FNS estimates that 96% (approximately 45,726,716 responses) of the information submitted in this collection is collected electronically and only a small percent is submitted non-electronically. Overall, out of the 47,631,996 responses for this collection, FNS estimates that approximately 4% (1,905,280 responses) will be submitted non-electronically. The bulk of non-electronic submissions consist of requirements that cannot be met electronically as they require observation of National School Lunch Program meal service and on-site inspections. The methods of data submission used for this collection (electronic and non-electronic) are intended to ease the burden on State agencies, SFAs, and schools to the extent possible while still maintaining high levels of program integrity.

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 data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and State administrative agency requirements. FNS solely administers and monitors the NSLP.

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.

Information being requested or required has been held to the minimum required for the intended use. State agencies are not considered small entities as State populations exceed the 50,000 threshold for a small government jurisdiction. However, SFAs, LEAs, and schools generally meet the definition of a “small governmental jurisdiction,” which meets the definition of “small entity” in the Regulatory Flexibility Act. FNS estimates that 99.6% or 115,499 of the 115,935 respondents (approximately 18,639 of the SFAs and all of the 96,860 schools) are small entities. Although smaller SFAs/schools record fewer financial transactions, they deliver the same program benefits and perform the same functions as larger SFAs/schools. Thus, they maintain the same kinds of information on file.

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 information is collected for the purpose of administering a required data collection for this program as stated in statute. Applications can be accepted and agreements executed at any time,

although generally these occur shortly before the beginning of a school year. SFAs submit claims for reimbursement for every month they operate, because funds for NSLP are budgeted on a fiscal year basis. If the data is collected less frequently, FNS would not be able to properly fund Programs, ensure program integrity, or monitor funding and program trends.

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 that is inconsistent with 5 CFR 1320.5:

- **Requiring respondents to report information to the agency more often than quarterly;**
State agencies submit monthly reports via FPRS on the FNS-10 to receive timely reimbursement. SFAs may submit claims less frequently than monthly, but must submit claims, at the latest, 60 days following the last day of the full month covered by the claim. State agencies may establish shorter deadlines at their discretion. Claims not postmarked and/or submitted within 60 days are not paid with Program funds unless FNS determines that an exception should be granted.
- **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 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. Specifically address comments received on cost and hour burden.

A 60-day notice was published in the Federal Register (84 FR 35589) on July 24, 2019. The comment period for the Information Collection ended September 23, 2019. FNS received 5 comments in response to the agency's notice. FNS received three comments that dealt with general perceptions of the NSLP. Two commenters noted that they oppose cuts to the Program (Attachment N and Attachment R), while another commenter noted their displeasure with the NSLP and stated it is unethical and damaging to Americans (Attachment M). These comments did not contain any information which alters FNS's previous burden estimates and gave more general feedback on the usefulness of the NSLP. FNS also received a comment from the Minnesota Department of Education. This comment suggested changes to the FNS-10, FNS-13, FNS-777, FNS-640, and FNS-828 forms and in particular to the number of burden hours associated with completing the FNS-828. These suggestions are consistent with the findings of the Child Nutrition Burden Analysis Study which FNS is using to determine the types of changes needed to reduce Program burdens. Because the changes suggested in the comment dealt with the reporting burden for these requirements which is maintained in FPRS (OMB #0584-0594), the Minnesota Department of Education's comment will be considered and the burden for the FPRS collection updated as needed. A comment submitted by the School Nutrition Association recommended that FNS consider the Child Nutrition Burden Analysis Study recommendations to reduce burdens, especially in the reporting process. FNS agrees that the results of the Child Nutrition Burden Study should be used to evaluate options to reduce burden in the Programs. FNS will consider these results when creating new guidance and technical assistance materials and will continue to seek opportunities to

improve customer service by reducing burden on Program operators. FNS provided written responses to the two commenters that included contact information (Attachment Q and Attachment S). With the exception of the comments from the Minnesota Department of Education and the School Nutrition Association, the remaining comments did not touch upon whether the information collection was necessary for the proper performance of the functions of the agency, including whether the collection has practical utility, the comments did not evaluate the accuracy of the agency's estimate of the burden, they did not provide suggestions concerning the quality, utility, or clarity of the information, nor did the comments minimize the burden of the collection of information on those who are to respond. Because of this, FNS did not reply to those comments, nor was the burden revised as a result of those 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 format (if any), and on the data elements to be recorded, disclosed, or reported.

FNS recently published the Child Nutrition Reducing Burden Study 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 the School Meal Programs. Survey topics and work group meeting topics included program standards, reporting, reviews, procurement, USDA guidance, and research participation. Within each topic area, States and local

educational agencies 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

- Angela Olige, Assistant Commissioner for Food and Nutrition, Texas Department of Agriculture (Angela.Olige@TexasAgriculture.gov)
- Heidi Dupuis, Manager, School Nutrition Programs, Oregon Department of Education (heidi.dupuis@state.or.us)
- John Frassinelli, Bureau of Health/Nutrition, Family Services and Adult Education, Office of Student Supports and Organizational Effectiveness, Connecticut Department of Education (John.Frassinelli@ct.gov)
- Vonda Cooke, State Director, Child Nutrition Programs, Division of Food and Nutrition, Pennsylvania Bureau of Budget and Fiscal Management (vcooke@pa.gov)
- Jo Dawson, Child Nutrition Program Manager, Alaska Department of Education & Early Development, Division of Finance & Support Services, Child Nutrition Programs, Alaska Department of Education and Early Development

(jo.dawson@alaska.gov)

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 decisions to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift was 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. No confidential information is associated with this information collection. This collection 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. 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.

This is a revision of the currently approved collection. With this submission, FNS estimates that this collection will have 115,935 respondents, 47,631,996 responses, and 9,808,454 burden hours. In two areas, existing information collection requirements are not accurately reflected under OMB #0584-0006. We are describing the burden of these existing requirements here:

- ***Administrative Review Cycle (Attachment K):*** This renewal adds reporting burden for the

hours needed to conduct administrative reviews and recordkeeping burden for the hours needed to maintain the results of the administrative reviews. The administrative review burden from the 2016 rulemaking under the “Administrative Reviews in the School Nutrition Programs” Final Rule (RIN 0584–AE30) has been a regulatory requirement since 2016, but has not been approved by OMB previously. State agencies are not required to report all data collected in Attachments T1-T25, but must complete these attachments in order to evaluate Program compliance and formulate the results that are reported on the FNS-640. The reporting burden for the FNS-640 is maintained under #0584-0594.

- ***Reporting on Performance-Based Reimbursement (Attachment L):*** The burden associated with the existing quarterly report requirement was inadvertently omitted from the renewal of #0584-0006 approved on November 13, 2016.

The number of respondents for this collection is 115,935. This includes 56 SA+ 19,019 SFAs/LEAs + 96,860 Schools. The total number of annual responses for this request is 47,631,996 (this includes 499,573 total annual responses for reporting + 47,100,736 total annual responses for recordkeeping + 31,687 total annual responses for public notification). The total requested burden hours for this revision is 9,808,454 (this includes 643,612 for reporting + 9,112,541 for recordkeeping + 52,301 for public notification). This revision will remove 221,546 burden hours from OMB’s information collection inventory. The following tables and Attachments A and B reflect the estimated burden associated with this information collection for each type of respondent:

ESTIMATED ANNUAL BURDEN FOR 0584-0006, NATIONAL SCHOOL LUNCH PROGRAM – 7 CFR PART 210 – REVISION OF AN APPROVED COLLECTION

REPORTING						
Description of Activities	Regulation Citation	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Annual Burden Hours
SA notifies SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with right to appeal.	210.18(i)(3)	56	113	6,328	8	50,624
SA provides the CACFP SA with a list of all NSLP schools with at least 50% or more children eligible for free or reduced price meals by February 1 each year.	210.19(f)	56	1	56	2	112
SA reports to FNS schools' compliance with food safety inspection requirements.	210.20(a)(7)	56	1	56	1.5	84
SAs submit a quarterly report to FNS detailing the disbursement of performance-based reimbursement to SFAs.	210.5(d)(2)(ii)	56	4	224	.25	56
SA completes Administrative Review and any corresponding documentation.	210.18 (c-h)	56	113	6,347	47.5	301,482
Total SA Reporting		56		13,011		352,358
SFA provides SA with list of all schools with at least 50% free or reduced-price enrolled children and the attendance boundaries for those schools upon request of a CACFP sponsor of homes.	210.9(b)(21)	19,019	1.25	23,774	0.25	5,943
SFAs review NSLP afterschool care programs.	210.9(c)(7)	6,314	2	12,628	0.25	3,157
SFA submits to the SA monthly claims for reimbursement and eligibility data for enrolled children for	210.15(a)(1) & 210.8(b)&(c)	19,019	10.15	193,043	1	193,043

October.						
SFA submits to the SA an application, agreement, Free and Reduced Price Policy Statement, commodity preference, and annual certifications.	210.15(a)(2)&(4) & 210.9(a&b) & 210.7(d)(2)	19,019	1	19,019	0.25	4,755
SFA submits to the SA a written response to reviews documenting corrective action for Program deficiencies.	210.15(a)(3) & 210.18(k)(2)	6,340	1	6,340	8	50,720
SFA reports to the SA the number of safety inspections obtained by each school.	210.15(a)(7)	19,019	1	19,019	0.5	9,510
School food authorities shall report prices of paid lunches for each school to the State agency.	210.15(a)(8) & 210.14(e)(7)	19,019	1	19,019	0.25	4,755
Total SFA Reporting		19,019		292,842		271,882
Schools shall post the most recent food safety inspection and provide a copy upon request.	210.13(b)	96,860	2	193,720	0.1	19,372
Total School Reporting		96,860		193,720		19,372
Total Reporting		115,935		499,573		643,612

RECORDKEEPING						
Description of Activities	Regulation Citation	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Annual Burden Hours
SA maintains documentation of LEA/SFA compliance with nutrition standards for competitive foods.	210.18(h)(2)(iv)	56	113	6,328	0.25	1,582
SA maintains accounting records and source documents to control the receipt, custody and disbursement of Federal NSLP funds and documentation supporting all SFA claims paid by the SA. (FNS-10)	210.20(b)(1&2) & 210.23(c) & 210.5	56	340	19,040	3	57,120
SA maintains documentation to support	210.20(b)(3) & 210.17(g)&(h)	56	1	56	1	56

the reported amount of State funds used for State revenue matching requirements. (FNS-13)						
SA maintains records of all reviews and audits (including Program violations, corrective action, fiscal action and withholding of payments). (FNS-640)	210.20(b)(6) & 210.18(o)(f)(k)(l)(m) & 210.23(c)	56	113	6,328	8	50,638
SA maintains documentation of fiscal action taken to disallow improper claims submitted by SFAs, as determined through claims processing, reviews, and USDA audits.	210.20(b)(7) & 210.19(c) & 210.18(o)	56	113	6,328	0.5	3,164
SA maintains documentation used to conduct Administrative Review.	210.18 (c-h)	56	113	6,347	0.5	3,173
SA shall prepare records on schools eligible to receive USDA donated foods.	210.20(b)(10) & 210.19(b)	56	1	56	3	168
SA maintains records from SFAs of food safety inspections obtained by schools.	210.20(b)(11)	56	340	19,040	0.25	4,760
SA maintains records of paid reimbursable lunch prices obtained from SFAs. (FNS-828)	210.20(b)(12) & 210.14(e)(7)	56	340	19,040	0.2	3,808
SA maintains documentation of compliance with professional standards for State directors of School Nutrition Programs.	210.20(b)(14)	56	1	56	0.25	14
Total SA Recordkeeping		56		82,619		124,483
SFA maintains files of children directly certified.	210.9(b)(19)	19,019	4	76,706	0.65	49,449
LEAs & SFAs maintain documentation of compliance with nutrition standards for all competitive food for sale to students.	210.11(b)(2)	19,019	1	19,019	20	380,380
SFA maintains	210.15(b)(1) &	19,019	10	190,190	5	950,950

documentation of participation data by school to support monthly Claim for Reimbursement and data used in the claims review process.	210.8(a)(5)					
SFAs maintain documentation to support performance based reimbursement and the attestation of compliance.	210.15(b)(2) & 210.7(d)(2)	19,019	1	19,019	0.25	4,755
SFA maintains files of school meal applications.	210.15(b)(4) & 210.9(b)(18&20)	19,019	1	19,019	2.66	50,591
SFA maintains calculations of average paid lunch prices and adjustments.	210.15(b)(6) & 210.14(e)	19,019	1	19,019	5	95,095
SFA documents revenue from sale of non-program foods accrues to the nonprofit school food service account and is compliant with requirements.	210.15(b)(7) & 210.14(f)	19,019	1	19,019	10	190,190
SFA maintains documentation of compliance with professional standards for school nutrition directors, managers and personnel.	210.15(b)(8); 210.30(g)	19,019	1	19,019	0.25	4,755
SFA/LEA must retain records to document compliance with the local school wellness policy requirements in 210.30(f).	210.15(b)(9) and 210.31(f)	19,019	1	19,019	0.25	4,755
Total SFA Recordkeeping	19,019			399,399		1,730,919
School maintains written statements signed by a license physician of the need for substitutions and recommending alternate foods.	210.10(m)	29,058	1	29,058	0.08	2,325
Organizations responsible for food service in schools maintain records.	210.11(b)(2)	96,860	1	96,860	0.5	48,430
School maintains documentation of participation data by school to support the Claim for Reimbursement.	210.15(b)(1)	96,860	180	17,434,800	0.15	2,615,220
Schools maintain	210.15(b)(2)(3) &	96,860	180	17,434,800	0.25	4,358,700

production and menu records.	210.10(a)(3)					
School maintains food safety records and records from most recent food safety inspection.	210.15(b)(5) & 210.13(b&c)	96,860	120	11,623,200	0.02	232,464
Total School Recordkeeping		96,860		46,618,718		7,257,139
Total Recordkeeping		115,935		47,100,736		9,112,541

Public Notification						
Description of Activities	Regulation Citation	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Annual Burden Hours
SA must post a summary of the most recent administrative review results of SFAs on the SA website and make a copy available upon request.	210.18(m)(i)	56	113	6,328	.25	1,582
Total SA Reporting		56		6,328		1,582
LEA must inform the public annually about the content and implementation of the local school wellness policy and any updates.	210.31(d)(2)	19,019	1	19,019	1	19,019
LEA must conduct triennial assessments of schools' compliance with the local school wellness policy and inform public about progress.	210.31(d)(3),(e)(2), (e)(3)	6,340	1	6,340	5	31,700
Total LEA/SFA Public Notification		19,019		25,359		50,719
Total Public Notification		19,075		31,687		52,301

BURDEN SUMMARY (OMB #0584-0006)						
	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Burden Hours	
Reporting Total	115,935		499,573		643,612	
Recordkeeping Total	115,935		47,100,73		9,112,541	

		6			
Public Notification Total	19,075	31,687			52,301
Total Burden	115,935	410.8	47,631,99	6	.21

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 Employment 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 LEA staff are estimated at \$23.89 per staff hour. To determine the total cost to the public, the burden hours for the collection is multiplied by the hourly mean wage discussed above (\$23.89 X 9,808,454 hours), which results in an initial cost of \$234,323,966.06 An additional \$77,326,908.80 (33% of \$234,323,966.06) is then added to account for fully-loaded wages, which results in a total cost to the public of \$311,650,874.86.

A13. Estimate of Other Total Annual Cost Burden.

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 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 is no capital/start-up or ongoing operation/ 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. 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.

It is estimated that Federal employees receiving an average General Schedule (GS) grade 12 step 6 wage (\$46.62 hourly) based on the 2019 Washington, DC-Northern Virginia locality area take approximately 1,260 hours to analyze data received from State agencies, for an initial cost of \$58,741.20 (\$46.62 x 1,260 hours). To account for fully-loaded wages, an additional \$19,384.60 (33% of \$58,741.20) is then added to the initial costs, resulting in an estimated annualized cost to the Federal Government of \$78,125.80. Additionally, it is estimated that a Branch Chief receiving an average GS grade 14 step 6 wage (\$65.51 hourly) based on the 2019 Washington, DC-Northern Virginia locality area take approximately 516 hours to provide oversight for Federal employees working to analyze data received from State agencies, for an initial cost of \$33,803.16 (\$65.51 x 516 hours). To account for fully loaded wages, an additional \$11,155.04 (33% of 33,803.16) is then added to the initial cost, resulting in an estimated annualized cost to

the Federal Government of \$44,958.20. The total estimated annualized cost to the Federal Government is \$123,084.

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 a currently approved collection. The information collection is currently approved with 10,030,000 total annual burden hours and 49,822,405 total annual responses. The total reporting, recordkeeping, and third-party disclosure burden hours associated with this revision is being decreased to 9,808,454 burden hours, removing 221,546 burden hours in the OMB information collection inventory (+304,711 burden hours due to the addition of existing requirements in use without OMB approval, which is offset by a reduction of -526,257 burden hours due to adjustments). The total annual responses associated with this revision are being decreased to 47,631,996 responses, removing 2,190,409 responses from the OMB information collection inventory (while 12,918 responses were added to the collection as the result of the addition of an existing requirement in use without OMB approval, they are offset by a reduction of 2,203,327 responses, mainly due to a decrease in the number of participating SFAs and schools). FNS estimates that this renewal will increase the reporting burden by 289,797 hours (+301,538 hours for the addition of existing requirements in use without OMB approval and -11,559 hours for adjustments), decrease the recordkeeping burden by 410,123 hours (+3,173 hours for the addition of a previously undisclosed burden and -413,296 hours for adjustments), and decrease the public notification burden by 101,402 hours (-101,402 hours for adjustments).

Adjustments are due to a decrease in the number of participating SFAs and schools as well as the removal of a one-time burden. Refer to Attachments A and B for the specific burden revisions made due to rulemaking requirements.

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.

There are no plans to tabulate or publish any information in connection with this information collection.

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 all 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.