

SUPPORTING STATEMENT - for
Renewal for OMB Control Number 0584-0293: Food Distribution Programs

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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 a currently approved information collection. The Food Distribution Programs of the Department of Agriculture (USDA), Food and Nutrition Service (FNS) assist American farmers and needy people by purchasing USDA donated foods and delivering them to State agencies that, in turn, distribute them to organizations for use in providing food assistance to those in need. The USDA donated foods help to meet the nutritional needs of: (a) children from preschool age through high school in FNS Child Nutrition Programs and in nonprofit summer camps, (b) needy persons in households on Indian reservations participating in the Food Distribution Program on Indian Reservations (FDPIR) and Food Distribution Program for Indian Households in Oklahoma (FDPIHO), (c) needy persons served by charitable institutions, (d) elderly persons participating in the Commodity Supplemental Food Program (CSFP), (e) low-income, unemployed or homeless people provided foods through household distributions or meals through soup kitchens under the Emergency Food Assistance Program (TEFAP), (f) pre-school and school-age children, elderly, and functionally impaired adults enrolled in child and adult day care centers participating in the Child and Adult Care Food Program (CACFP), and (g) victims of Presidentially-declared disasters and other situations of distress.

Authorizing legislation allows the Secretary broad authority to establish regulatory provisions promoting accountability in the use of USDA donated foods by Federal, State, and private agencies. Below are the primary legal authorities:

- Section 4(b) of the Food and Nutrition Act of 2008, as amended (7 U.S.C. 2013(b)) (Attachment 1)
- Sections 6, 14, and 17 of the National School Lunch Act, as amended (42 U.S.C. 1755, 1762a, and 1766) (Attachment 2)
- Section 4 of the Child Nutrition Act of 1966, as amended (42 U.S.C. 1733) (Attachment 3)
- The Emergency Food Assistance Act of 1983, as amended (7. U.S.C. 7501 et. seq.) (Attachment 4)
- Sections 4(a) and 5 of the Agriculture and Consumer Protection Act of 1973, as amended (7 U.S.C. 612c note) (Attachment 5).

Additionally, the regulatory information for these forms can be found in CFR 7 Parts 247-254, as described in Table 1 (Attachments 6 through 11).

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.

The information reported and the records kept for purposes of review under 7 CFR Parts 240, 247, 250, 251, 253, and 254 are used by State and recipient agencies and FNS regional and headquarters offices for the purpose of administering USDA Food Distribution Programs. Depending on the information requirements, respondents will provide information either quarterly, monthly, semi-annually, annually, or on an as-needed basis. The frequencies are based on program requirements. The collections are primarily mandatory for State, local, and Tribal Governments, non-profits, and for Private for profit entities. The only collection that is necessary to obtain benefits is in the form of individual

program recipient applications. The individual program applications are State provided forms. FNS does not provide any templates or examples to the states but does offer to review the forms if the states have any questions concerning them. The requirements for CSFP forms are outlined in 7 CFR 247.8, Individuals applying to participate in CSFP. Certification periods are determined by the State as outlined in 7 CFR 247.16.

Some of the information related to program food distribution and the use of USDA foods will be shared with State governments. Table 1 provides information about each of the forms.

Table 1: The Purpose of Donated Food Forms and Data Collection Instruments

Form number	Regulation	Purpose	Collection (Paper and Electronic)
FNS-7 Destination Data for Food Deliveries (Attachment 12)	7 CFR §250.11(a)	Distributing agencies arrange for delivery of donated foods to storage facilities. State distributing agencies complete Form FNS-7. The form is used in all commodity programs and contains information on the destination point for commodity shipments, including the optimal day and time for deliveries, and the means of shipment. It is submitted whenever changes in destination data are made.	Email
FNS-52 Food Requisitions	7 CFR §250.58	State Distributing Agencies or National Regional Offices fill out this form to order USDA foods. This information is collected so States can receive the specific foods they want. This occurs on an on need basis depending on inventory levels.	Electronic collection using Web Based Supply Chain Management (WBSCM) (Attachment 13A)
FNS-53 Requisition for Multi-Food Shipments	7 CFR §250.58	State Distributing Agencies use this form to order various types of USDA Foods. This information will allow states to get the USDA foods of their choosing for their program.	Electronic collection using Web Based Supply Chain Management (WBSCM)

		While states may make requests for various foods to be an ordering option, submitting this single form is how they will go about actually ordering more than one type of USDA Foods. This occurs on an on need basis depending on inventory levels.	(Attachment 13B)
FNS-57 Report of Shipments Over, Short, and/or Damaged	7 CFR §250.11(b)	This is to gather information on shipments that have more food than order, do not contain the entire order, and/or have damaged goods. How these situations arise will differ. However, submitting this single form is the avenue they will use to share this information. This occurs on an on need basis depending on the status of the shipment.	Electronic collection using Web Based Supply Chain Management (WBSCM) (Attachment 13C)
FNS-152 Monthly Distribution of Donated Foods to Family Units (used in FDPIR) (Attachment 14)	7 CFR §250.18(a)	ITOs or State Distributing Agencies will combine inventory data and submit the form to the appropriate regional office monthly. How each state gathers the information will differ. However, submitting the single form is the avenue they will use to share this information.	Electronic collection using Food Programs Reporting Systems (FPRS), Form is uploaded as an excel file to FPRS
FNS-153 Monthly CSFP Report and Quarterly Administrative Financial Status (Attachment 15)	7 CFR §247.29(a) & (b)(2)(ii)	State Distributing Agencies submit the form to the appropriate regional office monthly. How each state gathers the information will differ. However, submitting the single form is the avenue they will use to share this information.	Electronic collection using Food Programs Reporting Systems (FPRS)
FNS-155 Inventory Management Register (Attachment 16)	7 CFR §250.18(a)	The FNS-155 captures by type, commodities physically warehoused in any State-operated or State-contracted storage facility that exceeds a cumulative 6 month inventory. Commodities remaining in these warehouses at the end of the report month shall be counted as State inventory until such commodities are distributed to recipient and/or sub- distributing	Email

		agencies. This is done twice a year.	
FNS-667 Report of TEFAP Administrative Costs (Attachment 17)	7 CFR §251.9(e) & 251.10(d) (1)	On a quarterly basis, State distributing agencies must identify funds obligated and disbursed to cover administrative costs associated with the program at the State and local level to show that they are meeting the matching requirement. State distributing agencies also submit a final report. State distributing agencies identify their matching administrative contribution on Form FNS-667 "Report of TEFAP Administrative Costs."	Electronic collection using Food Programs Reporting Systems (FPRS)

In addition to the Agency-developed forms above, FNS also uses OMB Standard Forms SF-424 (Attachment 18), and SF-425 (Attachment 19, in the Food Distribution programs. The burden hours associated with the activities reported on these forms are cleared in other OMB packets and are not included in the total burden hours listed in this statement.

However, at OMB’s request, a description of the forms is listed below:

SF-424

The SF-424 form is an OMB approved collection under OMB# 4040-0004. The SF-424 was established as the government-wide standard core data set and form for grant applications in July 31, 2003. The **SF 424** (R&R) Form is used in all grant applications.

This form collects information including type of submission, applicant information, type of applicant, and proposed project dates. Out of the total burden of 20,803 hours and 14,883 responses for this form, FNS estimates that the FDD programs will use 1,757, hours and 1,757 responses.

253.4(d), Application by an Indian Tribal Organization (ITO) or State agency. An ITO or State agency wishing to administer FDPIR on one or more Indian reservations completes an

application, utilizing Form SF-424, “Application for Federal Assistance,” and submits it to the FNS Regional Office, along with pertinent information. The application includes projected administrative costs for the program, of which a minimum of 80 percent are met by Federal grant. Applications are completed annually using Form SF-424.

SF-425

FNS also uses SF-425, Federal Financial Report, which is one of the forms under OMB# 4040-0014, is approved for FNS use under OMB# 0584-0594 Food Programs Reporting System (FPRS). Out of the 15,533 hours and 10,355 responses estimated for this form, FDD estimates that they will use 2,461 hours and 1,651 responses. The SF-425 form is a required Office of Management and Budget (OMB) financial reporting form to track the status of financial data tied to a particular Federal grant award. Grant recipients must submit completed SF-425 form.

247.29(a)(1), Reports and recordkeeping. State agencies in CSFP submit Form SF-425, Financial Status Report, to report the financial status of the program at the close of the fiscal year.

253.11(j)(2), Accounting for Funds Received and Financial Status Reports. ITOs and State agencies receiving funds for FDPIR through a Letter of Credit must submit to the FNS Regional Office quarterly financial reports and an annual financial report regarding their use of administrative funds utilizing Standard Form SF-425 “Financial Status Report”.

FNS-152, FNS-153, FNS-667 are all approved under OMB# 0584-0594 Food Programs Reporting System (FPRS)(Attachments 20A through 20C), expiration date September 30, 2019 (the renewal package is currently under review at OMB and is awaiting approval).

However, for this renewal, these forms and their associated reporting burden will remain with this OMB collection number, OMB# 0584-0293.

FNS is planning to split this collection into smaller collections and these forms and their burden will be deleted at this time. In addition, this collection uses other forms that are covered under OMB# 0584-0594 Food Programs Reporting System (FPRS), expiration date September 30, 2019 (the renewal package is currently under review at OMB and is awaiting approval) to report data associated with this collection: FNS-44, FNS-10, FNS-191, and FNS-292 (Attachments 20-D through 20-G). These forms and their associated reporting burden are approved as part of the burden for OMB# 0584-0594, so their reporting burden is not duplicated here. However, any recordkeeping burden that is associated with these forms is included in the burden for this collection. Screenshots of these forms are provided merely for reference purposes. Please note that when accessing the forms in FPRS, users see a Welcome Page before they access their individual forms (Attachment 20H). The Welcome Page contains an OMB Disclosure Statement that covers all of the forms in FPRS. FNS generally combines the Welcome Page and the specific form into one file, but the agency has been having difficulty combining these into one file so the Welcome Page and the individual forms are provided as separate attachments.

There have been no changes to the information collection requirements since OMB approved the last submission under this OMB control number in September 2018. FNS has not added any new information collection requirements or new forms into the collection. While working on the renewal, FNS determined that the number of respondents for the

reporting and recordkeeping requirements needed to be adjusted to ensure that the total number of unique respondents was accurately calculated. The respondent numbers were recalculated by isolating the largest number of respondents from each respondent group (e.g. food banks versus State agencies) and totaling them to ensure that each group was accounted for and the number of those responding was accurate. As part of this adjustment, some of the respondent numbers for some of the information requirements for the private for-profit and non-profit respondents changed, which in turn changed the response and burden hour estimates for these items. In addition, FNS also determined that the time estimate shown in the Excel Burden table for the Destination Data for Delivery of Donated Food under 7 CFR 250.11(a), collected via the FNS-7 form, needed to be adjusted from 3 minutes to 30 minutes to match the time estimate shown on the form. This change adjusted the burden hour estimates. There are no other burden changes for this collection at this time.

While FNS has not added any new forms into the collection, we determined that a couple of existing forms that were previously used or associated with this collection are now obsolete. The burden for FNS form, FNS-663 Food Distribution Commodity Acceptability Progress (CAP) Report, was removed from this collection in 2014 but the form was not removed from the collection when the burden was removed. FNS-663 is still in the collection, so FNS is removing it at this time as part of this revision. The other instance involves FNS form, FNS-74 Federal-State Agreement. This form and its associated reporting burden was approved under OMB# 0584-0067 7 CFR Part 235 – State Administrative Expense (SAE) Funds, expiration date 11/30/19 (this collection is currently under review at OMB).

However, as part of the 2019 renewal activity for OMB# 0584-0067, it was determined that these state agreements are permanent agreements that FNS expects to remain constant with no additional agreements submitted, revised, or retracted. Since FNS determined that the burden for FNS-74 will remain constant, the state agreements, their associated reporting burden, and FNS-74 were deleted from OMB# 0584-0067. In the case of OMB# 0584-0293, FNS-74 was used as the vehicle for some of the state agreements used in the Food Distribution Programs (no burden was included for it in OMB# 0584-0293, however, because that burden was already accounted for in OMB# 0584-0067). FNS reviewed the decision to remove FNS-74 from OMB# 0584-0067 and determined that it applied to this collection as well so references to FNS-74 will be removed from this collection as part of this revision. As with OMB# 0584-0067, if FNS finds that any changes are made to the existing agreements or that new agreements are entered into, FNS will add the FNS-74 and its associated burden into this collection. The removal of FNS-663 and FNS-74 does not impact the burden for this collection.

See Attachment 21 (Burden Narrative) for a breakdown of the reporting and recordkeeping requirements contained in each of the relevant parts of Federal regulations (note that the forms associated with this ICR are also discussed in Attachment 21).

Effective administration of Food Distribution Programs is dependent on the collection and submission of information to FNS from State and recipient agencies. This information includes, for example, the kinds of USDA donated foods most acceptable to recipients, the quantities of foods ordered and where the food is to be delivered, verification of the receipt

of a food order, and the amounts of USDA donated foods in inventory.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The Food and Nutrition Service makes every effort to comply with the E-Government Act of 2002. FNS encourages its State agency partners to offer electronic submission to participants whenever it is feasible. Currently all State agencies that provide commodities to schools and other FNS nutrition programs are using the Web Based Supply Chain Management System (WBSCM) (Attachment 22). Approximately 220 State and recipient agencies submit data to USDA electronically using WBSCM. Approximately 1,034,122 responses are submitted electronically via WBSCM. This breaks down to:

- State, Local, Tribal (SLT) reporting responses = approximately 1.7% of total responses;
- State, Local, Tribal recordkeeping responses = approximately 1.6% of total responses;
- Private For Profit reporting responses = approximately 21% of total responses; and
- Private For Profit recordkeeping responses = approximately 21% of total responses.

The link for WBSCM is <http://www.usda.gov/wps/portal/usda/usdahome?navid=WBSCM>.

For more information on WBSCM see Attachment 22, WBSCM FAQs and Tips. Out of the total 3,816,391 responses in this collection, FNS estimates that 1,034,122 (approximately 27%) are submitted 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 data collection effort available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements. FNS solely administers and monitors the Food Distribution Programs. At this time, the only duplication is in the reporting requirements. FNS forms FNS-152, 153, and 667 are listed as part of the reporting requirements and are included in the burden for this collection. However, these reporting requirements, with their associated forms and burden, are approved under OMB# 0584-0594 Food Programs Reporting System (FPRS). Due to the complexity of the renewal, FNS has not fully removed these forms and their burden from this collection at this time. However, FNS is planning to split this collection into smaller collection(s) centered on particular programs and will remove these forms and their associated burden from the collection as this time.

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.

The information being requested or required has been held to the minimum required for the intended use. Although smaller businesses or entities are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other entity or business. Thus, they maintain the same kinds of information on file. FNS estimates that one percent of the businesses, approximately 44 respondents, are 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 data collection that is required by statute and regulation. This is

primarily a mandatory data collection, although the collection does contain requirements that are required to obtain or retain a benefit. The principal consequences of less frequent collection would be the loss of management control. The data relates to statutory and regulatory requirements. Its collection assists the Agency in being a good steward in monitoring Federal funds and detecting or correcting problems that result from a State agency's failure to satisfy statutory and regulatory requirements. The frequencies for the reporting and recordkeeping requirements range from on occasion to monthly, depending on the requirement. Please refer to the burden narrative (Attachment 21) for the frequency for the specific requirements in this collection.

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;**

Forms FNS-7 Destination Data for Delivery of Donated Foods; FNS-52, Food Requisition; FNS-53 Multi-Food Requisition; FNS-57 Receipt of Shipments; FNS-152, Monthly Distribution of Donated Foods to Family Units; and FNS-153, Monthly Report of the Commodity Supplemental Food Program and Quarterly Administrative Financial Status Report; and FNS-155 Inventory Management Register; and FNS-667 Report of the Emergency Food Assistance Program Administrative Costs are collected more frequently than quarterly to ensure efficient management of the Food Distribution programs. Timely ordering, receipt, inventory control, and accounting of USDA donated foods and funds are necessary to ensure the programs continue operating and the funds are spent during the appropriate time periods.

- **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.

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 published a 60-day notice titled “Agency Information Collection Activities: Proposed Collection; Comment Request-Food Distribution Programs” in the Federal Register on July 12, 2019 (84 FR 33218). The public comment period ended on September 10, 2019. FNS collected five comments during the comment period. Three of the comments received were not germane to FNS Food Distribution collections. Two of the comments were relevant and pertained to the management of USDA foods in schools.

The three comments not germane to Food Distribution collections did not address any of the forms in this information collection. The first comment (Attachment 23) was posted from an anonymous source and concerned mandatory drug screening and the ability to make renewals online. This comment is not relevant to this collection, because renewals do not apply to this collection nor does mandatory drug testing. The second comment (Attachment 24) was posted by a private citizen concerning limiting availability of food assistance. This comment is not pertinent to this information collection. The last comment (Attachment 25) was also from a private citizen. This comment was concerning State's rights during times of disaster. Currently Food Distribution forms do not single out disaster food assistance. After review of these comments, it was determined that they did not relate to the necessity of the information collection, the practical utility to achieve stated objectives, or the elements that impact burden.

The first germane comment provided recommendations to reduce administrative burdens in the reporting process (Attachment 26). The comment was received from the School Nutrition Association. FNS has reviewed these recommendations and is currently exploring potential modifications to reporting requirements and procedures in order to ensure effective and efficient administration of Food Distribution programs. One of the suggested recommendations provided in the comment is currently underway. Currently, FNS is working to standardize reporting and reduce administrative burden in the USDA Foods Further Processing Program. The standardized reporting needs to be evaluated for the necessary WBSCM system changes. System changes require a period for development and

system testing. Additionally, changes to the system must be evaluated for level of effort and cost. After these factors have been finalized with stakeholders, FNS will work to make changes to the collection process. FNS has provided a response to the School Nutrition Association conveying this information (Attachment 26A).

The second comment was received from the Minnesota Department of Education (Attachment 27). The comment included some suggestions to improve the current technology, WBSCM, used to electronically collect inventory information. They recommended that FNS retire the FNS-7 and incorporate the form into WBSCM. Additionally, they suggested that changes to the FNS-155 are needed to align the form with the current procedures. FNS does not currently have plans to add the FNS-7 into WBSCM, however this recommendation will be taken into consideration as a potential future system enhancement. In order for this change to occur, FNS will have to review the scope and cost needed to make this change. FNS will also review if an update is needed to FNS-155. A response to these concerns has been provided to the Minnesota Department of Education (Attachment 27A).

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

FNS consults with Regional Offices regarding any proposed changes as the result of legislative, regulatory, or administrative changes. Regional offices are in constant contact with State agencies which provide feedback on FNS processes and procedures that may impact them. The following individuals have been consulted specifically regarding reporting

requirements of the USDA Foods Further Processing Program, the requirements of which are laid out in Part 250.30 to 250.39:

- John Surdy, Comptroller, Nardone Brothers Baking Company, phone: 570-823-0141;
- Carole Erb, Director, Education Sales, JTM Foods, phone: 800-626-2308; and
- Chad Mohr, USDA Foods Distribution Director, Nebraska Department of Health and Human Services, phone: 402-560-0480.

These individuals have participated in several conferences and meetings in 2019, where they have consulted on the FD forms. These include, the Special Nutrition Assistance Annual Conference on July 14-16 2019, the American Commodity Distribution Association Processing Committee meeting on October 8-9 2019, and on National Processor Agreement Quarterly calls (last call was on September 13, 2019).

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

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

Respondents are not paid or provided with any gifts.

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. Personally identifiable information is not collected for the majority of this collection. However, households applying for CSFP and TEFAP disaster program do provide some personally identifiable information. Households applying for CSFP and TEFAP disaster programs apply

directly at the local agency. The local agency collects information required in 7 CFR 247.8, which includes the name and address of each applicant. Additionally 7 CFR 247.8(b) (Attachment 6) has a required pre-printed statement:

“I authorize the release of information provided on this application form to other organizations administering assistance programs for use in determining my eligibility for programs and for program outreach purposes. (70 FR 47063, Agu.. 11, 2005, as amended at 79 FR 38750, July 9, 2014)”

This statement is approved by OMB under this control number. This is a requirement for the local agency to include in their application form. FNS does not provide the local agencies with the forms nor is the application information that is obtained at the local agency sent to FNS.

This ICR does not include a form that requires 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 sensitive questions involved 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 a currently approved information collection. The estimated reporting burden for this information collection including the number of respondents, frequency of response, average time to respond and annual hour burden are shown in the attached Burden Narrative (Attachment 21) and Burden Table (Attachment 28). A summary of the burden appears below. With this revision, FNS estimates that this collection will have 638,170 respondents, 3,816,391 responses, and 1,161,377 burden hours.

Table 2: Reporting and Record Keeping

Reporting					
Affected Public	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total Burden
State, Local, and Tribal Governments	21,440	10.84	232,319.24	0.25	58,904.50
Private For Profit	3,443	250.29	861,749.33	0.03	26,229.88
Private Not for Profit	2,087	2.29	4,781.00	0.23	1,095.50
Individual	611,200.00	1.96	1,199,200.00	0.25	304,400.00
Total Burden Estimates	638,170.00	3.60	2,298,049.57	0.17	390,630.00
Record Keeping					
State, Local, and Tribal Governments	21,440.00	21.97	471,130.46	0.08	35,413.02
Private For Profit	3,443	300.44	1,034,429.00	0.06	62,671.72
Private Not for Profit	2,087	6.12	12,782.00	52.63	672,662.29
Individual	0	0.00	0.00	0.00	0.00
Total Burden Estimates	26,970.00	56.30	1,518,341.46	0.51	770,747.03

Summary					
Reporting	638,170.00	3.60	2,298,049.57	0.17	390,630.00
Recordkeeping	26,970.00	56.30	1,518,341.46	0.51	770,747.03
TOTAL	638,170.00	5.98	3,816,391.03	0.30	1,161,377.03

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

We estimate the total cost to respondents to be \$26,598,539 per year for reporting and recordkeeping combined for all Food Distribution Programs. The respondent cost is the estimated total burden and uses the mean hourly wage rate of \$17.22, defined in the May 2018, “Occupational Employment Statistics” published by the U.S. Department of Labor, Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes211093.htm>). With a burden of 1,161,377 hours at \$17.22 per hour, the base annual respondent cost is estimated at \$19,998,910.44. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$6,599,640.45. Thus the total annual respondent cost is \$26,598,551.

Table 3: Respondent Cost

Affected Public	Est. No. of Respondents	Total Annual Responses	Est. Total Burden	Hourly Wage Rate	Respondent Cost*
State, Local, and Tribal Governments	21,440	703,449.70	94,317.52	\$17.22	\$1,624,147.75
Private For Profit	3,443	1,896,178.33	88,901.60	\$17.22	\$1,530,885.55
Private Not for Profit	2,087	17,563.00	673,757.29	\$17.22	\$11,602,109.14
Individual	611,200.00	1,199,200.00	304,400.00	\$17.22	\$5,241,768.00
TOTAL	638,170	3,816,391.03	1,161,376.91		\$26,598,551*

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*Respondent Cost has .33% added to the total to account for fringe benefits

A13. Estimates 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 are no capital, start-up, or annual maintenance costs to respondents of the food distribution programs.

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 05 wage for the Washington DC area 2019 OMB Salary Table (\$45.29 hourly), take approximately 7 staff years to analyze data received from this information collection:

Headquarters Staff	2.00 staff years
Regional Staff	5.00 staff years
Total Staff Years	7.00 staff years

An additional 33% of the estimated base annual cost to the Federal government must be added to represent fully loaded wages, equaling \$217,609. Thus the total annual respondent cost is \$5,878,556.

7 staff years or 14,560 hours at \$45.29 per hour:	\$659,422
33% for Fringe Benefits	\$217,609
Cost of maintaining WBSCM Annually:	\$5,000,000
Printing of Forms (\$30.00 per thousand copies):	\$750
Distribution of Forms:	\$175
Warehousing of Forms:	\$600
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Total Federal Cost:	\$5,878,556

A15. Explanation of program changes or adjustments.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a revision of a currently approved information collection. This collection is currently approved with 1,160,535 burden hours and 3,814,782 responses. For this renewal, the number of respondents for the reporting and recordkeeping requirement were adjusted to ensure that the total number of unique respondents was accurately calculated. As part of this adjustment, some of the respondent numbers for some of the information requirements for the private for-profit and non-profit respondents changed, which in turn changed the response and burden hour estimates for these items. In addition, FNS adjusted the time estimate in the Excel Burden table for a State, Local, and Tribal government requirement under 7 CFR 250.11a, to provide destination data for the delivery of donated foods. This information is reported via FNS-7, which listed the time estimate for this activity at 30 minutes. This estimate differed from that in Excel Burden table, which showed the time estimate at 3 minutes. FNS determined that the time to complete this activity was 30 minutes and therefore adjusted the time accordingly in the Excel Burden table. Taking these changes into account, FNS estimates that the burden for this collection will increase by 1,609 responses and 842 burden hours due to adjustments. With this revision, FNS estimates that this collection will have 1,161,377 burden hours and 3,816,391 responses.

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 submission does not involve the collection of information through statistical methods. Also, there are no plans to publish any of the information collected.

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 of the OMB 83-I" Certification for Paperwork Reduction Act."

No exceptions are made to the certification statement.