

**SUPPORTING STATEMENT FOR  
OMB CONTROL NUMBER 0584-NEW**

**Meal Service and Monitoring Requirements in the National School Lunch and School  
Breakfast Programs**

**Proposed Rule:**

**Simplifying Meal Service and Monitoring Requirements in the National School Lunch and  
School Breakfast Programs (RIN 0584-AE67)**

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**Table of Contents**

A1. Circumstances that make the collection of information necessary.....3

A2. Purpose and Use of the Information.....4

A3. Use of the Information Technology and Burden Reduction.....7

A4. Efforts to Identify Duplication.....8

A5. Impacts on Small Businesses or Other Small Entities.....8

A6. Consequences of Collecting the Information Less Frequently.....9

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....10

A8. Comments to the Federal Register Notice and Efforts for Consultation.....11

A9. Explain any decision to provide any payment or gift to respondents.....13

A10. Assurances of Confidentiality Provided to Respondents.....13

A11. Justification for any questions of a sensitive nature.....13

A12. Estimates of the Hour Burden of the Collection of Information.....13

A13. Estimate of Other Total Annual Cost Burden.....19

A14. Provide Estimates of Annualized Cost to the Federal Government.....19

A15. Explanation of Program Changes or Adjustments.....20

A16. Plans for tabulation, and publication and project time schedule.....21

A17. Displaying the OMB Approval Expiration Date.....22

A18. Exceptions to the Certification Statement Identified in Item 19.....22

**Attachments**

- A. Burden Chart for 0584-NEW Meal Service and Monitoring in the National School Lunch and School Breakfast Programs
- B. Estimate of the Information Collection Burden for OMB# 0584-NEW Meal Service and Monitoring in the National School Lunch and School Breakfast Programs

- 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. Proposed Rule: Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs (RIN 0584-AE67)
- F. Child Nutrition Act of 1966 (42 U.S.C. 1779)
- G. Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.)

## **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 new information collection that is associated with a proposed rule titled “Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs” (RIN 0584-AE67). Section 10 of the Child Nutrition Act of 1966 (42 U.S.C. 1779) (Attachment F) 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 G), 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 rule proposes changes to simplify meal pattern and monitoring requirements in the National School Lunch and School Breakfast Programs. The proposed changes, including

optional flexibilities, are customer-focused and intended to help State and local Program operators overcome operational challenges that limit their ability to manage these Programs efficiently.

The proposed rule will revise existing information requirements that are currently approved under OMB# 0584-0006 7 CFR Part 210 National School Lunch Program. This is in addition to imposing new burdens that are related to the types of activities that are covered under this collection. Because the approval for OMB# 0584-0006 is currently under OMB review (the collection originally expired on September 30, 2019 and the approval date is being extended on a monthly basis), FNS is requesting a new OMB# for these provisions. After the final rule is published and the Office of Management and Budget (OMB) has reviewed and approved the submission related to the final rule, FNS plans to merge these requirements into OMB# 0584-0006.

## **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. These requirements are explained in the “Estimate of the Information Collection Burden for OMB # 0584-NEW Meal Service and Monitoring in the National School Lunch and School Breakfast Programs” located in Attachment B. The Program is administered at the State agency

and School Food Authority (SFA) levels and the Act requires that accounts and records are maintained as may be necessary to enable FNS to determine whether the program is in compliance with this Act and the regulations.

The Program is administered at the State and school food authority (SFA) levels. It is mandatory that State and SFAs under this Act keep accounts and records as may be necessary to enable FNS to determine whether the program is in compliance with this Act and the regulations. This includes requirements for State agencies to maintain records necessary for all reviews and audits (including Program violations, corrective actions, fiscal actions, and withholding payments) documentation of compliance and administrative reviews, and records of actions taken on disallowed claims. These records are collected from each SFA every five years. Additionally, this collection includes a recordkeeping requirement for state agencies to maintain documentation used to conduct targeted Follow Up Administrative Review. Reporting requirements for this collection include requirements for State agencies to notify SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with grounds and right to appeal and for SFAs to submit written responses to state agency reviews documenting corrective action for Program deficiencies. These records are collected from each SFA every five years. Additionally, this rule requires the annual reporting of disbursement of performance-based reimbursement. The information collected is used to ensure FNS can properly monitor State agency and SFA compliance and to inform USDA policy making. SFAs primarily report data using electronic submission systems, though some States receive a small percentage of hard copy submissions. Regarding public notification requirements, state agencies must 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 five years.

This rule proposes changes to the administrative review cycle that aim to ease administrative burden for State agencies and SFAs, while promoting Program integrity, by allowing State agencies to revert from the current 3-year review cycle to a longer review cycle. This proposed change would require that State agencies conduct a comprehensive administrative review of each SFA participating in NSLP, SBP, and other Federal school nutrition programs at least once during a 5-year cycle and require State agencies to identify high-risk SFAs for additional oversight. State agencies would continue to have the option to review SFAs more frequently. High-risk SFAs would receive additional oversight through a targeted follow-up review within two years of being designated as high-risk. Conducting follow up reviews would be a new recordkeeping and reporting burden. Additionally, this rule proposes to amend the requirement that State agencies submit a report to USDA detailing SFAs certified to receive the performance-based reimbursement (§210.5(d)(2)(ii)) from quarterly to annually. This requirement was previously included in the OMB# 0584-0006 information collection, but was mistakenly removed during the last renewal of that information collection.

The administrative review burden from previous rulemaking under the “Administrative Reviews in the School Nutrition Programs” Final Rule (RIN 0584–AE30) has not previously been approved by OMB since FNS is developing and finalizing forms and tools that assist State

agencies with their reporting and recordkeeping requirements. The burden 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. These errors have been addressed in the revision of OMB# 0584-0006 that is currently under review at OMB.

### **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. State agencies collect and maintain data for administrative reviews from SFAs via their own electronic systems. The bulk of the burden consists of the time it takes for the State agencies to conduct administrative reviews. These reviews occur on site and cannot be done electronically as it requires observation of National School Lunch Program meal service and on-site inspections. State agencies collect and maintain data for administrative reviews from SFAs via their own electronic systems. There is a small amount of



non-electronic submissions that are sent via email, flash drive or facsimile. Out of the total 28,000 responses for this rulemaking collection, FNS estimates that 18,480 (approximately 66%) is collected electronically.

#### **A4. Efforts to Identify Duplication.**

**Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

There is no similar 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, School Food Authorities generally meet the definition of a “small governmental jurisdiction” which meets the definition of “small entity” in the Regulatory Flexibility Act. FNS estimates that 3,787 respondents are small entities. Out of the total 3,864 respondents for this collection, FNS estimates that these 3,787 small entities equal 98% of the respondents.

**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 that is being collected through this new collection is associated with the proposed rule, “Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs (RIN 0584-AE67). It is used to administer an ongoing, mandatory data collection for this program that is required by statute. This rulemaking will allow SFAs to receive administrative reviews on a five-year cycle, meaning State agencies will be collecting information from one-fifth of the SFAs in their state each year. The recordkeeping requirements for this collection include maintaining records necessary for all reviews and audits (including Program violations, corrective action, fiscal action, and withholding payments) documentation of compliance and administrative reviews, and records of actions taken on disallowed claims. These records are collected from each SFA every five years. Additionally, this rule adds a recordkeeping requirement for state agencies to maintain documentation used to conduct targeted Follow Up Administrative Review. FNS anticipates that this would apply to one-third of the SFAs reviewed annually. Reporting for this collection include requirements for State agencies to notify SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with grounds and right to appeal and for SFAs to submit written responses to state agency reviews documenting corrective action for Program deficiencies. These records are collected from each SFA every five years. Additionally, this rule requires the annual reporting of

disbursement of performance-based reimbursement. Regarding public notification requirements, state agencies must 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 five years. If the data is collected less frequently, FNS would not be able to ensure program integrity, properly fund Programs 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;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established**

**in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**A8. Comments to the Federal Register Notice and Efforts for Consultation.**

**If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day Federal Register Notice is embedded in the proposed rule titled "Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs (RIN 0584-AE67)," which was published in the Federal Register on January 23, 2020 (Volume 85, Number 15, pages 4094-4134). The public comment period ends on April 22, 2020. Comments will be received and evaluated on the information collection requirements during that time. During this time, interested members of the public have the opportunity to

provide FNS with comments concerning the necessity, practical utility, accuracy, and merit of the information collection activities proposed. Comments will be addressed during the final stage of rulemaking with the final rule information collection request.

**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.**

USDA has engaged extensively with State agencies on how to streamline the review process while maintaining effective oversight. Through this engagement, USDA has learned more about the unique circumstances and challenges faced by States, as well as best practices and potential flexibilities to help State agencies fulfill oversight and program integrity responsibilities. As part of ongoing efforts to support Program operators, USDA held four listening sessions and roundtable discussions with school food service staff and school district administrators, industry representatives, and State agency staff in fall 2018 (on September 20, October 2, October 23, and December 6) to solicit additional information about Program challenges and suggestions for improvement. Stakeholder feedback was consistent with feedback that senior policy officials receive during in-person Child Nutrition Program visits. Some Program operators describe persistent challenges with complex requirements that limit their ability to feed children. Administrative challenges identified by Program operators include completing more comprehensive administrative reviews in a shorter, 3-year cycle and submitting reports required by FNS. Meal pattern challenges include food waste, weekly vegetable requirements, and offering meals in

schools that serve multiple age/grade groups. Program operators also suggested improvements to competitive food and beverage requirements that would permit them to reduce food waste and offer more items that appeal to students.

**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.

**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 new information collection that contains the existing information collection requirements from OMB Number 0584-0006 which are being impacted by this rulemaking as well as new information collection requirements. This proposed rule would revise the NSLP requirements, including recordkeeping and reporting requirements, to ease administrative burden for State agencies and SFAs, while continuing to ensure Program integrity. However, in two areas, these existing information collection requirements are not accurately reflected under OMB #0584-0006. These errors have been corrected in the revision currently under review at OMB. However, for transparency and to provide clarity regarding the impact of the changes proposed in this rulemaking, we are describing the burden of these existing requirements here:

- **Administrative Review Cycle:** This rule proposes to allow State agencies to revert from the current 3-year review cycle to a longer review cycle of 5 years, which would reduce the

current reporting and recordkeeping burden by increasing the length of the review cycle. However, the burden associated with these reviews, which have been a regulatory requirement since 2016, has not been reflected to date in the approved collection under #0584-0006. The needed change in recordkeeping burden estimates to correct this error is described in the table below:

<b>Recordkeeping under OMB# 0584-0006</b>								
<b>Description of Activities</b>	<b>Regulation Citation</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Annual Burden Hours</b>	<b>Hours Currently Approved</b>	<b>Corrected Burden Hour Estimate</b>
SA completes and maintains documentation used to conduct Administrative Review.	210.18 (c-h)	56	113	6,347	48	304,640	0	304,640
<b>Total SA Recordkeeping</b>								-
<b>Total Recordkeeping</b>								304,640

- **Reporting on Performance-Based Reimbursement:** This rule proposes that the performance-based reimbursement quarterly reporting requirement specified in §210.5(d)(2)(ii) be changed to an annual reporting requirement. However, the burden associated with the existing quarterly report requirement was inadvertently omitted from the renewal of #0584-



0006 approved on November 13, 2016. The needed change in reporting burden estimates to correct this error is described in the table below:

<b>Reporting under OMB# 0584-0006</b>								
<b>Description of Activities</b>	<b>Regulation Citation</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Annual Burden Hours</b>	<b>Hours Currently Approved</b>	<b>Corrected Burden Hour Estimate</b>
SAs submit an annual report to FNS detailing the disbursement of performance-based reimbursement to SFAs.	210.5(d)(2)(ii)	56	4	224	.25	56	0	56
<b>Total SA Reporting</b>								56
<b>Total Reporting</b>								<b>56</b>

The number of respondents for this collection is 3,864 (this includes 56 SAs+ 3,808 SFAs). The total number of annual responses for this request is 28,000 (this includes 7,672 total annual responses for reporting + 16,520 total annual responses for recordkeeping + 3,808 total annual responses for third party disclosure (known as public notification)). The total requested burden is 298,614 (this includes 60,942 for reporting + 236,720 for recordkeeping + 952 for third party disclosure). 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-NEW**

<b>REPORTING</b>						
<b>Description of Activities</b>	<b>Regulation Citation</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Annual Burden Hours</b>
SA notifies SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with right to appeal.	210.18(i)(3)	56	68	3,808	8	30,464
SAs submit an annual report to FNS detailing the disbursement of performance-based reimbursement to SFAs.	210.5(d)(2)(ii)	56	1	56	.25	14
<b>Total SA Reporting</b>		<b>56</b>		<b>3,864</b>		<b>30,478</b>
SFA submits to the SA a written response to reviews documenting corrective action for Program deficiencies.	210.15(a)(3) & 210.18(k)(2)	3,808	1	3,808	8	30,464
<b>Total SFA Reporting</b>		<b>3,808</b>		<b>3,808</b>		<b>30,464</b>
<b>Total Reporting</b>		<b>3,864</b>		<b>7,672</b>		<b>60,942</b>

<b>RECORDKEEPING</b>						
<b>Description of Activities</b>	<b>Regulation Citation</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Annual Burden Hours</b>
SA maintains documentation of LEA/SFA compliance with nutrition standards for competitive foods.	210.18(h)(iv)	56	68	3,808	0.25	952
SA maintains records of all reviews and audits (including Program	210.20(b)(6) & 210.18(o)(f) (k,l,m) &	56	68	3,808	8	30,472

violations, corrective action, fiscal action and withholding of payments). (FNS-640)	210.23(c)					
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	68	3,808	0.5	1,904
SA completes and maintains documentation used to conduct Administrative Review.	210.18 (c-h)	56	68	3,808	48	182,784
SA completes and maintains documentation used to conduct targeted Follow Up Administrative Review.	210.18 (c)	56	23	1,288	16	20,608
<b>Total SA Recordkeeping</b>		<b>56</b>		<b>16,520</b>		<b>236,720</b>
<b>Total Recordkeeping</b>		<b>56</b>		<b>16,520</b>		<b>236,720</b>

<b>PUBLIC NOTIFICATION</b>						
<b>Description of Activities</b>	<b>Regulation Citation</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Annual Burden Hours</b>
State agencies 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)(1)	56	68	3,808	0.25	952
<b>Total SA Public Notification</b>		<b>56</b>		<b>3,808</b>		<b>952</b>
<b>Total Public Notification</b>		<b>56</b>		<b>3,808</b>		<b>952</b>

**BURDEN SUMMARY (OMB #0584-0006)**

	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Burden Hours
<b>Reporting Total</b>	<b>3,864</b>		<b>7,672</b>		<b>60,942</b>
<b>Recordkeeping Total</b>	<b>56</b>		<b>16,520</b>		<b>236,720</b>
<b>Public Notification Total</b>	<b>56</b>		<b>3,808</b>		<b>952</b>
<b>Total Burden</b>	<b>3,864</b>	<b>7.25</b>	<b>28,000</b>	<b>10.66</b>	<b>298,614</b>

**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 2019 National Occupational Employment and Wage Statistics, Occupational Group (25-0000) ([http://www.tbls.gov/oes/current/oes\\_nat.htm](http://www.tbls.gov/oes/current/oes_nat.htm)). The hourly mean wage (for education-related occupations) for functions performed by State agency and local educational agency staff are estimated at \$27.75 per staff hour. To determine the total cost to the public, the burden hours for the collection are multiplied by the hourly mean wage discussed above (\$27.75 X 298,614 hours), which results in an initial cost of \$8,286,538.50. An additional \$2,734,557.71(33% of \$8,286,538.50) is then added to account for fully-loaded wages, which results in a total cost to the public of \$11,021,096.21.

**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 annual 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 2020 Washington DC-Northern Virginia locality area take approximately 960 hours to analyze data received from State agencies, for an initial cost of \$46,329.60 ( $\$46.62 \times 960$  hours). To account for fully-loaded wages, an additional \$15,288.77 (33% of \$ 46,329.60) is then added to the initial costs, resulting in an estimated annualized cost to the Federal government of \$61,618.37. Additionally, it is estimated that a Branch Chief receiving an average GS grade 14 step 6 wage (\$67.82 hourly) based on the 2020 Washington DC-Northern Virginia locality area take approximately 416 hours to provide oversight for Federal employees working to analyze data received from State agencies, for an initial cost of \$28,213.12 ( $\$67.82 \times 416$  hours) To account for fully-loaded wages, an additional \$9,310.33 (33% of \$ 28,213.12) is then added to the initial cost, resulting in an estimated annualized cost to the Federal government of \$37,523.45. The total estimated annualized cost to the Federal government is \$99,141.82.

**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 new information collection resulting from the proposed rule titled “Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs.” FNS estimates that this new information collection will add 298,614 hours and 28,000 responses to OMB’s inventory. Please note, however, that the proposals outlined in the rule impact existing information collection requirements that are approved under OMB Number 0584-0006 7 CFR Part 210 National School Lunch Program. The current inventory under OMB# 0584-0006 for the information requirements outlined in this proposed rule is 165,290 hours; however, there is a revision of this collection currently under review at OMB that will adjust these estimates to 469,986 hours. Using the currently approved burden for OMB# 0584-0006, the proposed rule will increase the burden hours by 133,324 hours. Ultimately, however, FNS estimates that this rule will reduce the burden by approximately 171,372 hours (the Excel chart that is submitted with this request reflects the burden changes based on the current burden for OMB# 0584-0006; FNS expects that the revision will be approved when the agency prepares the ICR for the final rule so the reduction in burden hours referred to above will be captured in the ICR associated with the final rule). After the final rule has been published, FNS will submit an information collection package to OMB for review outlining any changes to the proposals and revising the burden estimates to reflect the adjustments. Once OMB has reviewed and approved the information collection associated with the final rule, FNS will merge the requirements and burden changes into OMB# 0584-0006. 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.