

**7 CFR Part 225 – Summer Food Service Program**

**OMB CONTROL NUMBER 0584-0280**

**Proposed Rule: Streamlining Program Requirements and Improving Integrity in the  
Summer Food Service Program (SFSP) (RIN 0584-AE72)**

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**Attachments**

- A. Burden Chart for OMB Control #0584-0280 7 CFR Part 225 – Summer Food Service Program ( SFSP)
- B. Estimate of the Information Collection Burden (Narrative) for the SFSP
- C. Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.)
- D. Streamlining Program Requirements and Improving Integrity in SFSP Proposed Rule (RIN 0584-AE72)

## **A. JUSTIFICATION**

### **A1. Circumstances that make the collection of information necessary.**

**Explain the circumstances that make the collection of information necessary.**

**Identify any legal or administrative requirements that necessitate the collection.**

**Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This information collection is being submitted in support of the proposed rule, “Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program (RIN 0584-AE72) (Attachment D),” which proposes to revise existing information collection requirements currently approved under OMB control number 0584-0280, 7 CFR Part 225 Summer Food Service Program (SFSP). Section 13 of the Richard B. Russell National School Lunch Act (NSLA), 42 U.S.C. § 1758, as amended, authorizes SFSP for service of meals and snacks to children in low-income areas during the summer months. Collection of information is required to administer and operate SFSP in accordance with the NSLA.

This rulemaking proposes to strengthen program integrity in SFSP by codifying in regulations changes that have been tested through policy guidance and by streamlining requirements among Child Nutrition Programs. The proposals are expected to reduce both the burden hours and responses for some of the information collection requirements currently approved under OMB #0584-0280.

## **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.**

Information is required to administer and operate SFSP in accordance with the NSLA and 7 CFR Part 225 at local and state levels. Information collection requirements impacted by this rule are primarily mandatory (some requirements are required to obtain or retain benefits) as required by statute and regulations. The intended effect of the rulemaking is to clarify, simplify, and streamline program administration in order to facilitate compliance with program requirements for both State agencies and sponsors. The information that is required to be collected by this rule is shared between the sponsor and the State agency. FNS does not collect or share the required information; however, State agencies and sponsors are required to maintain these records in case of inspection or audit by FNS, in which case FNS may review these records in order to ensure compliance with statute and regulations.

SFSP is administered at the State level, thus entities that wish to operate the program as a sponsor must annually submit applications to their respective State agencies for approval. Each State agency maintains its own website and systems to electronically collect applications for participation, site information, and program agreements. Required application information contains identifying data, site location data, and information necessary for the State agency to determine whether the sponsor is capable of successfully operating the program. Once a State agency approves an application, the

agency will enter into an agreement with the sponsor for local level program operation and delivery of program benefits, in this case meals, and services to eligible children.

This rule proposes several changes that would streamline application requirements for experienced sponsors and sites that have already operated the SFSP without significant operational problems, and modify application requirements for sponsors in good standing in other Child Nutrition Programs when applying to SFSP. Currently, SFSP regulations require certain procedures for new sponsors and sponsors that have experienced significant operational problems that are applying to participate in the SFSP, while experienced sponsors that have already operated the SFSP are able to submit condensed information when applying to participate. In addition, current regulations require sponsors applying to participate in the program to demonstrate financial and administrative capability for program operations and accept financial responsibility for total program operations at all sites at which they propose to conduct a food service.

The rule is proposing to allow sponsors in good standing that operate NSLP and CACFP to follow the same application requirements as experienced SFSP sponsors. FNS expects the changes in application requirements proposed in the rule to eliminate duplicative documentation and paperwork, and save time for SFSP's 5,524 sponsors (3,314 local/tribal governments, and 2,210 non-profit institutions and camp sponsors), including 1,066 new sponsors (640 local/tribal government sponsors and 426 non-profit institutions and camps sponsors). Furthermore, under the proposed changes, sponsors in good standing in NSLP and CACFP would not be required to demonstrate financial and

administrative capability to participate in SFSP. School food authorities and CACFP institutions already undergo a rigorous application process in order to participate in NSLP and CACFP and have demonstrated that they have the financial and organizational viability, capability, and accountability necessary to operate a Child Nutrition Program, and thus, have the potential to operate the SFSP as well. Roughly 10 percent (553) of sponsors (332 local/tribal government and 221 business sponsors) would be asked to submit further evidence of financial and administrative capability annually. This proposed change is expected to reduce the reporting burden associated with program applications for experienced Child Nutrition Program sponsors.

The proposed rule also introduces a new method for conducting meal claim validations as part of the sponsor review. State agencies are required to review sponsors and sites to ensure compliance with program regulations, including reviewing meal claims. Sponsors submit meal service data to State agencies electronically, and each State has its own system to collect and track the data. 100 percent of this information is submitted electronically. The State agency then must validate 100 percent of the meal claim forms from sponsors under review to ensure their accuracy. State agencies are required keep a record of the results of these meal claim validations for three years.

FNS recognizes that conducting 100 percent of meal claim validations for all sites under the sponsor being reviewed, instead of just the sampled sites, may be burdensome for some State agencies. In the case of large sponsors with many sites, this requirement often uses significant State agency resources and, based on feedback from State agencies, does

not necessarily help improve the integrity of the program. For sponsors that run effective programs in compliance with program requirements, only a small portion of meal claims may need to be validated in order to confirm compliance. In recognition of this, the proposed meal claim validation method would reduce the portion of meal claims that need to be validated by assisting in selecting a representative sample of the sponsor's sites. FNS expects this proposed change would result in a decrease in burden hours and responses for all 53 State agencies.

The changes outlined above facilitate compliance with program requirements by simplifying the application process, enhancing monitoring requirements, and providing more discretion at the State agency level to manage program operations. The proposals are expected to reduce both the burden hours and responses for the currently approved information collection, OMB #0584-0280. The burden narrative, which highlights the changes proposed by this rule for some of the reporting requirements, in addition to the reporting, recordkeeping, and public disclosure requirements currently approved for this collection, can be found, with their CFR citations, in Attachment B. The burden associated with this proposed rule is highlighted in the Burden Table (Attachment A).

### **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 of 2002 to promote the use of the Internet and other information technologies which provide increased opportunities for citizen access to Government information and services.

All program operation information and materials are available for download from the FNS website. FNS estimates that approximately 100% of the State agencies will submit reporting data electronically. In addition, each State agency maintains its own website to communicate electronically with sponsors and households in their state. For the nine information requirements proposed under this rule, FNS estimates that all of them will be collected electronically through these State agency systems. Therefore, for the total 271,065 responses for this collection, FNS estimates 100 % will be collected electronically.

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

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

The SFSP is administered at the Federal level solely by FNS, and there is no similar information collection available. FNS has reviewed USDA reporting requirements and State administrative agency requirements to ensure that every effort has been made to avoid duplication.



**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.**

Certain local agencies and community organizations associated with SFSP meet the definition of “small entities.” The amount of information requested has been limited to the minimum required for the intended use. Although smaller sponsors are involved in this data collection effort, they deliver the same program benefits and perform the same functions as their larger counterparts. Thus, they must maintain the same types of data on file. Out of the total 5,524 sponsors impacted by the proposed rule, FNS estimates that approximately 2,762 (approximately 50%) of them are considered small entities. Out of the total 63,942 respondents for this collection, FNS estimates that 2,762 (approximately 4.3%) of the respondents are considered small entities.

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

**Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This is a revision to an ongoing information collection that is being submitted in conjunction with the proposed rule entitled “Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program.” The requirements impacted by the rule are primarily mandatory (some requirements are required to obtain or retain benefits) as required by statute. Collecting information less frequently may result in the delayed allocation of Federal funds. If the information collection is not conducted or is conducted less frequently, FNS would not be able to ensure compliance, nor allocate and

reimburse claims in a timely manner.

#### **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;**
- **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 for the information requirements proposed in the rule.

The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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

**If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

**Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

A 60-day Federal Register Notice is embedded in the proposed rule titled “Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program (RIN 0584-AE72), which was published in the Federal Register on January 23, 2020 (85 FR 4064).” The comment period for the proposed changes in the information collection burden ended on April 22, 2020. Comments will be received and evaluated on the information collection requirements during that time. At 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. FNS received approximately 163 comments in response to the rule. FNS is evaluating the comments at this time and does not yet know how many (if any) of the comments

pertain to the information collection requirements. Once FNS has finished evaluating the comments, any comments pertaining to the information requirements will be addressed in the information collection request for the final rule.

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.**

When FNS finalizes an information collection package, the package will be available through [www.regulations.gov](http://www.regulations.gov) for review and comment by stakeholders such as State agencies, community groups, and the public regarding any proposed changes as the result of legislative, regulatory, or administrative changes. FNS consults with FNS Regional offices (FNSRO) regarding any proposed changes as the result of legislative, regulatory, or administrative changes. FNSRO are in daily contact with State agencies, which provide feedback on FNS processes and procedures for this information collection. Feedback from the State agencies is then used by FNS to help shape the burden estimates for this collection.

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

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

No payment or gift will be provided to respondents.

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

**Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Department complies with the Privacy Act of 1974, 5 U.S.C. § 552a, which requires the safeguarding of individuals against invasion of privacy. No confidential information is associated with this information collection. This information collection request does not request any personally identifiable information nor does it include 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.**

**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 to a currently approved information collection resulting from the proposed rule, “Streamlining Program Requirements and Improving Integrity in the

Summer Food Service Program.” This proposed rule impacts existing information requirements that are currently approved under OMB# 0584-0280, 7 CFR Part 225, Summer Food Service Program, which expires on December 31, 2022. The following paragraphs detail how the proposed rule will impact the current burden estimates.

The proposed rule impacts a total of nine requirements that can be found in the State agency and sponsor level categories (local/tribal Government and business sponsors). The proposed rule only impacts the burden associated with information reporting requirements. There are no changes to the information requirements or burden under recordkeeping or public disclosure. FNS estimates that the proposed rule has no impact on the number of respondents currently approved under OMB# 0584-0280. The proposed rule does, however, impact the responses and burden hours for the collection, which FNS estimates will decrease as a result of the rule.

The burden tables below show the specific requirements and burden related to the proposed rule. The summary chart shown below and the burden table in Attachment A reflect the impact that the proposed rule is estimated to have on the total burden for this collection (number of respondents, frequency of response, average time to respond, and annual burden hours). Details of the proposed changes can also be found in the Burden Narrative (Attachment B).

At the State level, FNS is proposing a multi-stepped meal claim validation process based on error detected. The proposed meal claim validation process provides a reduction in

burden for sponsors with very little error found at small, representative sample sites, and is expected to result in an overall reduction of burden hours from 2,055 hours to 288 hours, and responses from 24,764 responses to 3,465 responses. At this time, these figures are the best estimate of the burden associated with the new process, however, FNS expects to receive feedback through comments on this rule that may further sharpen these estimates.

At the sponsor level, FNS is proposing a streamlined application, which would affect the estimated time needed to complete an application for sponsors. For these program changes, the estimated average number of hours per response would decrease because the rule helps to simplify the application requirements between Child Nutrition Programs. Sponsors in good standing from other Child Nutrition Programs, such as the NSLP and the CACFP, would be permitted to use the application process for experienced sponsors when applying to the SFSP program. This proposed rule change would eliminate duplicative documentation and paperwork, which saves time for SFSP's 5,524 sponsors (3,314 local/tribal governments and 2,210 businesses). The amount of time needed for a sponsor to complete a SFSP application (including reviewing relevant policy, instructions, guidance, and handbooks issued by FNS) would decrease from 39.5 hours to 38.74 hours. The time necessary to submit information related to the application will also decrease. Specifically, the time needed to submit information about proposed sites would decrease from 1 hour to approximately 53 minutes (0.89 hours), and the time required for State agencies to enter into agreements with sponsors would decrease from 7.2 minutes (0.12 hours) to 5.58 minutes (0.093 hours).

The chart below is a reproduction of the fields in the Burden chart provided in the Paperwork Reduction Act analysis of the proposed rule that are affected by the application requirement changes, and illustrates the reduction in reporting hours and responses. The burden chart provided for the Paperwork Reduction Act analysis of the proposed rule was formatted to align with the terminology used in SFSP (State agencies and sponsors). This was done to make the requirements impacted by this rule and the corresponding burden estimates easier to understand by the affected public. The Burden Table (Attachment A) is broken out by OMB categories of the affected public (State, Local and Tribal governments, and business) for the purposes of adhering to OMB guidelines for Information Collection Requests. Though the chart presents the information differently than the Burden Table, the burden estimates are the same.



Reporting										
State Agency Level										
CFR Citation	Description	Estimated Number of Respondents	Estimated Frequency of Responses	Total Annual Records	Estimated Avg. # of Hours per response	Estimated Total Hours	Current OMB Approved Burden Hours in 0584-0280	Difference Due to Program Changes in 0584-0280	Differences Due to Adjustments	Total Difference in 0584-0280
225.7(e)(6)	State agencies utilize a multi-step process for meal claim validation based on amount of error detected	53	65.38	3,465	.083	287.58	2,055	-1767.39	0	-1767.39
<b>State Agency Level Total Change:</b>										-1767.39
Sponsor Level										
CFR Citation	Affected Public/ Description	Estimated Number of Respondents	Estimated Frequency of Responses	Total Annual Records	Estimated Avg. # of Hours per response	Estimated Total Hours	Current OMB Approved Burden Hours in 0584-0280	Difference Due to Program Changes	Differences Due to Adjustments	Total Difference
225.6(c)(1) and (4), 225.14(a)	Sponsors submit written application to SAs for participation in SFSP.	3,314 local or tribal government	1	3,314	38.74	128,384.36	130,903.00	-2,518.64	0	-2,518.64
225.6(c)(1) and (4), 225.14(a)	Sponsors submit written application to SAs for participation in SFSP.	2,210 business sponsors	1	2,210	38.74	85,615.40	87,295.00	-1,679.6000		-1,679.6000
	Total for	5,524	1	5,524	38.74	213,999.76	218,198	-4,198.24	0	-4,198.24

	sponsor applications									
225.6(c)(2) and (3)	Sponsors submit site information for each site where a food service operation is proposed.	640 new local or tribal government sponsors	1	640	0.89	569.60	640	-70.40	0	-70.40
225.6(c)(2) and (3)	Sponsors submit site information for each site where a food service operation is proposed.	2,675 experienced local or tribal government sponsors	1	2,675	0.89	2,380.75	2,675	-294.25	0	-294.25
225.6(c)(2) and (3)	Sponsors submit site information for each site where a food service operation is proposed.	426 new business sponsors	1	426	0.89	379	426	-46.8600	0	-46.8600
225.6(c)(2) and (3)	Sponsors submit site information for each site where a food service operation is proposed.	1,783 experienced business sponsors	1	1,783	0.89	1,587	1,783	-196.1300	0	-196.1300
	Total for sponsors' site information	5524	1	5,524	0.89	4916	5,524	-608	0	-608
225.6(e), 225.14(c)(7)	Sponsors approved for participation in SFSP enter into written agreements with SAs to operate program in accordance with regulatory	332 local/tribal government sponsors	1	332	0.093	30.88	40.84	-9.96	0	-9.96

	requirements									
225.6(e), 225.14(c)(7)	Sponsors approved for participation in SFSP enter into written agreements with SAs to operate program in accordance with regulatory requirements	221 business sponsors	1	221	0.093	21	27	-6.4470	0	-6.4470
	Total for sponsor written agreements	553	1	553	0.09	51	68	-16	0	-16
<b>Sponsor Level Total Change:</b>		<b>5,524</b>	<b>2.1</b>	<b>11,601</b>	<b>18.874</b>	<b>218,967.549</b>	<b>223,789.836</b>	<b>-4,822.3</b>		<b>-4,822.3</b>

OMB# 0584-0280 is currently approved with 63,942 respondents, 292,363 responses, and 338,411 burden hours. As a result of this proposed rule, FNS estimates that the reporting burden hours will decrease by 6,590 hours; therefore, FNS estimates that these changes will result in a total revised burden of 331,821 hours. In addition, FNS estimates that the total number of responses will decrease by 21,298 as well, resulting in a revised burden of 271,065 responses. A summary table follows, which shows what the estimated total burden hours and responses will be for this collection once the changes from the proposed rule are incorporated into the burden.

Burden Summary Chart of Revised Burden for #0580-0280, Summer Food Service Program due to Proposed Rule: *Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program*

	Estimated # Respondents	Number of Responses per Respondent	Total Annual Responses (Col. BxC)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. Dx E)
<b>Reporting</b>					
<b>Total Reporting Burden</b>	63,942	3	164,586	2	322,281
<b>Total Recordkeeping Burden</b>	5,577	18.09	100,902	0.08	8,145
<b>Total Public Disclosure Burden</b>	5,577	1	5,577	0.25	1,395
<b>Total Burden for #0584-0280</b>	63,942	4.24	271,065	1.22	331,821

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

FNS estimates that the total cost to respondents for this collection will be \$12,246,683.56.

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 and Wage Statistics, Occupational Group 25-0000 ([http://www.bls.govt/oes/current/oes\\_nat.htm](http://www.bls.govt/oes/current/oes_nat.htm)). The hourly mean wage for education-related occupations for functions performed by State agency and local education agency staff are estimated at \$27.75 per staff hour.

**TOTAL COST TO PUBLIC** = 331,821 hours X \$27.75 per hour = \$ 9,208,032.75

To account for fully-loaded wages, an additional \$3,038,650.81 (33% of \$9,208,032.75) has been added to \$9,208,032.75 for a total respondent cost of \$12,246,683.56.

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

**Estimate of other total annual cost burden to respondents or record keepers. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital or start-up costs or annual operation or maintenance costs for this collection of information.

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

**Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not**

**have been incurred without this collection of information.**

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

FNS used the following procedure to estimate this cost:

FNS identified functions performed by FNSRO and National Office (NO) staff that benefits the SFSP and obtained estimates of the total number of staff hours spent performing these functions.

<b>FEDERAL COSTS OF SFSP - PERSONNEL</b>				
<b>FUNCTION</b>	<b>DONE BY</b>	<b>TOTAL STAFF HOURS</b>	<b>SFSP ALLOCATION PERCENTAGE</b>	<b>PORTION TO SFSP (3X4)</b>
Professional Assistance to State agencies	FNSRO	22,880 hours	20%	4,576 hours
Drafting/ Clearing Regulations	NO	14,560 hours	40%	5,824 hours
Policy Development Guidance	NO	14,560 hours	40%	5,824 hours
<b>TOTAL</b>				<b>16,224</b>

The 2020 Federal Wage Salary Tables 2020 General Schedule (GS) Locality Pay Tables for the Rest of the United States and the 2020 Washington, DC-Northern Virginia locality table were used to estimate the hourly wages for FNSRO staff and NO staff, respectively (available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/general-schedule/>). FNS estimates the hourly wage rate is \$39.87 (the average hourly rate for a GS 11, Step 10, which is the grade level of staff who perform these functions) for FNSRO staff, and \$48.26 (the average hourly rate for a GS 12, Step 6, which is the grade

level of staff who perform these functions) for NO staff The computations are:

FEDERAL SALARIES

FNSRO Salaries (4,576 hours x \$39.87/hour)	\$182,445.12
NO Salaries (11,648 hours x \$48.26/hours)	\$562,132.48
10 % for Administrative overhead (10% x \$744,577.6)	\$74,457.76
<hr/>	
<b>Total Federal Cost</b>	<b>\$819,035.36</b>

**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 to a currently approved information collection resulting from the proposed rule, “Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program”. OMB# 0584-0280 7 CFR Part 225 Summer Food Service Program, is currently approved with 338,411 burden hours and 292,363 responses. FNS estimates that this proposed rule will reduce the burden for OMB# 0584-0280 by approximately 6,590 hours and 21,298 responses. Barring any changes to the current burden or changes to the final rule, FNS estimates that this proposed rule will reduce the burden hours and responses for this collection to 331,821 hours and 271,065 responses, respectively. 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. The specific burden changes for this information collection can be found in Attachment B.

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

**For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical use.

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

**If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The agency plans to display the expiration date for OMB approval of the information collection on related instruments.

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

**Explain each exception to the certification statement identified in Item 19**

**“Certification for Paperwork Reduction Act.”**

There are no exceptions to the certification statement.