

SCHOOL BREAKFAST PROGRAM 7 CFR PART 220

OMB Control NUMBER 0584-0012

REVISION OF A CURRENTLY APPROVED COLLECTION

Jeffrey Warner, Program Analyst

Food and Nutrition Service, USDA

Child Nutrition Programs

School Programs Branch

1320 Braddock Place

Alexandria, VA 22314

PH: 703-605-4372

jeffrey.warner@usda.gov

Table of Contents

A1. Circumstances that make the collection of information necessary 3

A2. Purpose and Use of the Information 3

A3. Use of information technology and burden reduction 5

A4. Efforts to identify duplication 6

A5. Impacts on small businesses or other small entities 6

A6. Consequences of collecting the information less frequently 6

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5 7

A8. Comments to the Federal Register Notice and efforts for consultation 8

A9. Explain any decisions to provide any payment or gift to respondents 9

A10. Assurances of confidentiality provided to respondents 10

A11. Justification for any questions of a sensitive nature 10

A12. Estimates of the hour burden of the collection of information 10

A13. Estimates of other total annual cost burden 14

A14. Provide estimates of annualized cost to the Federal government 14

A15. Explanation of program changes or adjustments 15

A16. Plans for tabulation, and publication and project time schedule15

A17. Displaying the OMB Approval Expiration Date16

A18. Exceptions to the certification statement identified in Item 19 16

Appendices

A. Public Comments

A1. Public Comment #1

A1R. Response to Public Comment #1

A2. Public Comment #2

A3. Public Comment #3

A3R. Response to Public Comment #3

A4. Public Comment #4

A5. Public Comment #5

A5R. Response to Public Comment #5

B. Excel Burden Chart for 0584-0012 School Breakfast Program

C. Burden Narrative for 0584-0012, 7 CFR Part 220 School Breakfast Program

D. Child Nutrition Act of 1966 (42 U.S.C. 1773)(as amended through P.L. 111-296, Effective Dec. 13, 2010)

E. Title 7 CFR Part 220 – The School Breakfast Program

F. Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.)

G. FNS-10 Report of School Program Operations

H. FNS-777 Financial Status Report

I. OMB# 0584-0594 Food Programs Reporting System (FPRS) Home Screen with OMB Information and Public Burden Statement

JUSTIFICATION

1. Circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a revision of the currently approved information collection for the School Breakfast Program (SBP). Section 4 of the Child Nutrition Act (CNA) of 1966 (42 U.S.C. 1773) (Appendix D) authorizes the School Breakfast Program as a nutrition assistance program and authorizes payments to States to assist them to initiate, maintain, or expand nonprofit breakfast programs in schools. The provision requires that “Breakfasts served by schools participating in the School Breakfast Program under this section shall consist of a combination of foods and shall meet minimum nutritional requirements prescribed by the Secretary on the basis of tested nutritional research.”

SBP regulations are located in Title 7 CFR Part 220 (Appendix E). The citations for specific program regulations that are associated with this collection and necessitate a collection of information and impose reporting and record keeping requirements on State and local levels are identified in column “B” of the burden chart (Appendix B).

2. 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.

This information collection is required to administer and operate the SBP in accordance with the CNA of 1966 and the Richard B. Russell National School Lunch Act (NSLA) (Appendix F). The Program is administered at the State and local levels, including school district and school site levels, and the operations include the submission and approval of applications to participate in the program, execution of agreements, record maintenance, and monitoring procedures. It is mandatory that States, school food authorities (SFAs), otherwise known as the governing body responsible for the administration of one or more schools, and individual schools, that wish to implement the SBP, keep accounts and records as may be necessary to enable FNS, State, and school district level program administrators to determine whether the program is in compliance with the CNA of 1966 and the NSLA, as well as corresponding regulations. The collection is mandatory to participate in the SBP, which is a Federal Child Nutrition Program. This information collection contains both reporting and recordkeeping burden. Information is collected and filed on behalf of State agencies, SFAs, and schools.

While State agencies are required to report program data monthly using the FNS-10 Report of School Program Operations form and quarterly using the FNS-777 Financial Status Report form for the SBP, the reporting burden associated with these forms is approved under the information collection for the Food Programs Reporting System (FPRS), OMB control #0584-0594, expiration date 7/31/23, and, therefore, is not included in this information collection. However, the recordkeeping burden associated with the FNS-10 and FNS-777 is maintained in this collection. Copies of these forms are included in this submission for reference (Appendices G, H, and I). Refer to Appendix C for additional details concerning the burden associated with

this information collection. This is an update to an ongoing collection. The overall burden associated with this information collection has decreased due to the use of newer and more accurate participation data available to FNS, which represented fewer SFA and school participants. No modifications to SBP requirements or the program's design have been made since the collection was last approved April 16, 2019.

More information regarding the types of information collected and the entities responsible for the collection and maintenance of such information is specified below:

• **What information will be collected?**

- Applications for new schools to participate in SBP will be collected by State administering agencies. SFAs submit applications on behalf of schools.
- Monthly claims for reimbursements are collected on behalf of States and maintained at the SFA and State levels. SFAs submit the claims for reimbursement to their respective State administering agencies.
- SFAs collect records demonstrating program compliance to provide for audits.
- Schools collect breakfast counts by category (free, reduced price, paid) each school day.
- State agencies maintain program records necessary to support reimbursement payments for SBP breakfasts.
- State agencies are required to investigate complaints received or irregularities noted in connection with the operation of the SBP. Therefore, State agencies collect and file evidence of complaint investigations and actions taken.

- State agencies collect and maintain records pertaining to action taken when claims are made against SFAs/schools and reimbursement payments are disallowed or recovered.
- State agencies collect eligibility information for schools eligible to receive a slightly higher reimbursement rate for SBP breakfasts served.
- Schools collect and file information regarding menu planning and compliance with the SBP meal pattern requirements.

• Is the information collected via a report or public disclosure, or is it a record that must be maintained?

- Information associated with this information collection is collected via reports and/or maintained as records.

• Is the collection voluntary, mandatory, or necessary to obtain benefits?

- The information collection activities addressed in the information collection only apply to States, SFAs, and schools that elect to participate in or implement the SBP. It is not mandatory to operate the program.

• How will this information be used?

- The information is collected to comply with SBP requirements. It is used by State agencies that administer the SBP and FNS to monitor program compliance and ensure program integrity.

• How will the information be collected (e.g., forms, descriptive reports or plans, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

- FNS estimates approximately 98% of the information collected due to SBP requirements

is collected electronically. SFAs and States have discretion to develop a prototype application for SBP participation that solicits information in sufficient detail to enable the State agency to determine whether a school is eligible to participate in the Program. State and local program administrators have discretion to decide how to document program operations' compliance with SBP requirements and support for reimbursement payments. Generally, schools, SFAs, and State agencies use computer software to file and maintain meal counts by type (free, reduced price, paid), which are in turn used to develop claims for reimbursement payments.

- **How frequently will the information be collected?**

- Information is collected in accordance with SBP requirements; contingent on the specific requirement, information may be collected or filed 3 times per month, one time per month during the school year (approximately 10 months total, depending on the State's definition of "school year"), annually, and daily during each school year (schools count meals by type each school day). To review the requirements in detail that require information to be collected and how frequently each collection occurs, please see Appendix C, *Burden Narrative for 0584-0012, 7 CFR Part 220 School Breakfast Program*.

- **Will the information be shared with any other organization inside or outside USDA or the government?**

- The information collected will only be shared between FNS, State agencies, SFAs, and schools working together to administer the SBP at the Federal, State, and local levels, as required.

3. 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.

FNS is committed to complying with the E-Government Act, 2002, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. All 56 state agencies and United States territories that administer this program submit some program and financial data electronically to FNS via the Food Programs Reporting System (FPRS) at <https://www.FPRS.usda.gov>. The burden for the data reported in FPRS on the FNS-10 and FNS-777 is included in the information collection for the Food Programs Reporting System (FPRS), OMB control #0584-0594, expiration date 7/31/23. State agencies collect participation and meal count information from SFAs and schools via their own electronic systems. There is a small amount of non-electronic submissions that are sent via email or flash drive or facsimile, such as providing records for audits or program evaluations. Out of an estimated 33,102,536 responses for this collection, FNS estimates that 32,440,485 responses (98%) in this collection are collected electronically, and only a negligible amount is submitted non-electronically.

4. 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 SBP.

5. Impacts on Small Businesses or Other Small Entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-i), describe any methods used to minimize burden.

Information being requested or required has been held to the minimum required for the intended use. State agencies are not considered small entities, as state populations exceed the 50,000 threshold for a small government jurisdiction. However, SFAs and schools generally meet the definition of a “small governmental jurisdiction,” which meets the definition of “small entity” in the Regulatory Flexibility Act. FNS estimates that 99.95% or 105,644 of the 105,700 respondents are small entities. Although smaller SFAs/schools record fewer financial transactions, they deliver the same program benefits and perform the same function as larger SFAs/schools. Thus, they maintain the same kinds of information on file.

6. 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 mandatory data collection that is required by statute. The information is collected for the purpose of administering the SBP program in respect to the program's statutory and regulatory requirements. Applications can be accepted and agreements executed at any time, although SFAs generally execute agreements at, or shortly before, the beginning of each school year. SFAs maintain their records to support their claims for reimbursements for every month they operate the SBP. Schools are required to keep production and menu records for the meals they produce and meal counts by type (free, reduced price, paid) each school day. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. State administering agencies are occasionally required to maintain records for when claims against SFAs are made and the State agency is required to disallow any portion of an inaccurate claim and recover any improper payment made to an SFA. Funds for the SBP are budgeted on a fiscal year basis. If the data is collected less frequently, the Program would be out of compliance with SBP regulatory requirements, and FNS would not be able to properly monitor program funding and program trends.

To review each requirement associated with the collection in detail and an explanation of how frequently a collection of information occurs due to each requirement, please see Appendix C, *Burden Narrative for 0584-0012, 7 CFR Part 220 School Breakfast Program*.

7. 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;**

Schools submit monthly counts of breakfast by category to their respective SFAs, SFAs submit monthly claims for reimbursement to their respective State agency, and State agencies submit requests for funds to pay SBP claims each month to FNS. In addition, Schools and SFAs are required to keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day; they are maintained every school day. Meeting the record keeping and reporting requirements is required to participate in and operate the Program. Compliance with program regulations is necessary to receive timely and accurate reimbursement for actual breakfasts served and to ensure program accountability.

- **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

8. Comments to the Federal Register Notice and Efforts for Consultation.

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

A 60 day notice was published on February 25, 2022 in the Federal Register, Vol. 87, No. 38, page 10767. The comment period for the information collection ended on April 26, 2022.

Five comments were received on the agency's notice, which are included in this information collection as Appendices A1, A2, A3, A4, and A5.

The comment included as part of this collection as Appendix A1 requested a copy of the information collection, and in response, FNS provided the draft burden table associated with the collection's revision. FNS' response is included in this collection as Appendix A1R.

The comment included as part of this collection as Appendix A2 noted the commenter's displeasure with the SBP, as well as the National School Lunch Program, and informed FNS that the program needs to be "shut down" and that "this program is making schools into restaurants and teachers into waitresses." Please see appendix A2 for additional content.

FNS did not provide a response to Public Comment #2, because it was a non-germane comment.

Appendix A3, public comment #3, was sent in on behalf of the President and Chief Executive Officer of the School Nutrition Association (SNA). The commenters noted a decrease in the SBP and recommended FNS seek ways to increase participation and initiate outreach activities to support a return to higher participation rates. The commenters further recommended to streamline processes to reduce the administrative and reporting burden Child Nutrition Program requirements impose on state and local levels and referenced FNS' *Child Nutrition Reporting Burden Analysis Study*, published July 2, 2019, which addressed key considerations for reducing burdens. In response, FNS thanked the commenters and notified SNA that FNS will further review the study and evaluate whether changes to the information collection and reporting requirements in the School Breakfast Program should be

considered for a future rulemaking. FNS also informed SNA that the agency provides ideas and best practices to promote the School Breakfast Program at <https://www.fns.usda.gov/sbp/marketing-ideas>. FNS will continue to share with schools marketing and outreach strategies that encourage consumption of healthy breakfasts each school day. For more information, please see FNS' response to SNA in Appendix A3R.

Appendix A4, public comment #4, was left in response to a consultation FNS conducted with a State agency staff member from the Connecticut State Department of Education. FNS reached out to consult with the Connecticut State Department of Education on April 25, 2022, who had not yet commented on the 60-day notice associated with the revision to the SBP's information collection request. In response to FNS' request for review of the collection and feedback, FNS was notified that an Education Consultant from Connecticut State Department of Education would provide feedback on the notice by submission of a comment on reginfo.gov. The State department also provided the commenter's name, title, affiliation, and contact information via email to include in this Supporting Statement. The State agency staff member's comment indicated a review of the revision to the information collection was conducted, yet it did not warrant any feedback. FNS did not provide a response. Please see the second bulletin in bold that serves as an additional part to this question below for additional details regarding FNS' consultations and Appendix A4 to see a copy of the comment submitted in response to FNS' consultation.

Appendix A5, public comment #5, was unrelated to the SBP's reporting and record keeping requirements and estimated burdens. The commenter did not provide feedback on the

information collections imposed on State and local administrations by SBP requirements, and, instead, requested the Food and Nutrition Service begin collecting demographic data. The comment also advised “more data should be gathered on improving health equity and implementing more culturally relevant meals as a way to garner more participation in the SBP.” In response (Appendix A5R), FNS thanked the commenter and informed the proposed collection only addresses current collections of information, as defined at Title 5 CFR Part 1320.3(c), required at the State and local levels in order to implement the SBP. However, FNS did address the commenter’s concerns by explaining USDA supports equity and inclusion in its Federal assistance programs and the use local foods in school meals to develop recipes reflective of cultural preferences. Please see Appendix A5R to see FNS’ response to public comment #5.

- **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 consulted with 3 State agency staff members regarding the proposed revision to the information collection. One respondent to FNS’ consultation was Therese (Teri) A. Dandeneau, who is an Educational Consultant for the Connecticut State Department of Education. In response to FNS’ request for review of the proposed collection and feedback, Connecticut State Department of Education informed FNS that Teri responded by commenting on the 60-day notice. The comment indicated, “The SBP information collection request’s revision has been reviewed, and I have no comments or feedback at this time with the proposed revisions.” Teri’s comment is included as Appendix A4. Teri’s information is

provided below.

- Therese A. Dandeneau, MS, RD
Education Consultant
Connecticut State Department of Education
School Child Nutrition Programs
Teri.dandeneau@ct.gov

FNS also consulted with The North Dakota Department of Public Instruction and the Iowa Department of Education. Both departments administer the SBP at the state level. One State agency staff member from each state administering agency agreed to consultation and provided their titles and contact information to include in this collection:

- Linda Schloer
Director, Child Nutrition and Food Distribution Programs
North Dakota Department of Public Instruction
600 East Boulevard Avenue, Department 201
Bismarck, North Dakota 58505
lschloer@nd.gov
- Patti Harding
Administrative Consultant
Iowa Department of Education
Grimes State Office Building
Des Moines, Iowa 50319

Linda Schloer, the director of Child Nutrition and Food Distribution Programs for North Dakota Department of Public Instruction, provided that the SBP data collection is necessary documentation to support state and local receipt of reimbursement for meals served, yet noted the agency's estimates of the burden of the proposed collection of information is too low. In Linda's feedback, it was indicated States' reporting capabilities vary significantly and that it should not be assumed that respondents in the collection have access to automated data collection and reporting capabilities. FNS recognizes that not all respondents in the collection

may have access to the same computer software and technological applications that ease record maintenance and reporting efforts and considered these inconsistencies when calculating the burden estimates.

The Administrative Consultant from Iowa Department of Education did not provide FNS essential feedback on the proposed revision to the SBP's information collection.

The comments received in response to the revised collection's notice and FNS' consultation did not alter FNS' updated revisions to the current collection and its burden estimates.

However, FNS will further evaluate North Dakota Department of Public Instruction's suggestion that the burden estimates are too low in the next revision to the SBP's information collection request.

9. 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.

No payment or gift was provided to respondents.

10. Assurances of Confidentiality Provided to Respondents.

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

The Department complies with the Privacy Act of 1974. No confidential information is

associated with this information collection. This ICR does not request any personally identifiable information, nor does it include a form that requires a Privacy Act Statement. This information collection was reviewed by FNS's Privacy Office on January 21, 2022. The Privacy Office did not indicate the collection warrants any privacy statement, privacy impact analysis, or privacy threshold analysis, as no personal identifiable information is collected and maintained by the agency.

11. 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.

12. 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.

12a) 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 collection that has a total of 110,268 respondents, 34,049,729 responses, and 3,857,770 burden hours. The following tables and Appendix B reflect the updated estimated burden associated with this information collection for each type of respondent.

**ESTIMATED ANNUAL BURDEN FOR 0584-0012, SCHOOL BREAKFAST PROGRAM
– REVISION OF A CURRENTLY APPROVED COLLECTION**

Reporting						
Description of Activity Required	Section	Estimated Number of Respondents	Frequency of Response	Average Annual Responses	Average Burden per Response	Annual Burden Hours
SA submits requests for funds to pay SBP claims.	220.5	56	36	2,016	0.25	504
SA submits records to USDA for MEs and audits.	220.15(b)	19	1	19	3	57
Total SA Reporting		56	---	2,035	---	561
SFA submits application to SA for new SBP participant.	220.7(a)	168	1	168	0.25	42

SFA submits to SA monthly reimbursement claim	220.11(a)	17,117	10	171,170	1	171,170
SFA submits claim exceptions	220.11(b)	117	1	117	0.75	87.75
SFAs provide records for audits.	220.15(c)	86	1	86	2	172
Total SFA Reporting		17,117	---	171,541	---	171,472
Schools submit breakfasts counts served by category to the SFA.	220.11(b)	88,527	10	885,270	0.05	44,263.5
Total Schools Reporting		88,527		885,270		44,263.5
Total Reporting		105,700	---	1,058,846	---	216,296

Record Keeping						
Description of Activity Required	Section	Estimated Number of Respondents	Frequency of Response	Average Annual Responses	Average Burden per Response	Annual Burden Hours
SA maintains Program records as necessary to support the reimbursement payments and reports.	220.13(b)(1)	56	36	2,016	0.083	167
SA maintains		56	1	56	2	112

evidence of compliant investigations and actions.	220.13(c)					
SA maintains all records regarding claims against SFAs.	220.14(d)	56	12	672	0.25	168
SA imposes rules on competitive foods.	220.12(a)	56	1	56	1	56
Total SA Record keeping		56	---	2,800	---	503
SFA maintains program records to support claims.	220.7(e) (13) and 220.11(b)	17,117	10	171,170	0.083	14,207
Total SFA Recordkeeping		17,117		171,170		14,207
Schools maintain food production, menu, and recent nutritional analysis records.	220.8(a)(3) 220.9(a)	88,527	180	15,934,860	0.12	1,912,183.2
Schools record breakfasts by category at point of service.	220.11(b)	88,527	180	15,934,860	0.1	1,593,486
Total Schools Record keeping		88,527		31,869,720		3,505,669
Grand Total Record keeping		105,700		32,043,690		3,520,380

SUMMARY OF BURDEN (OMB #0584-0012)	
TOTAL NO. RESPONDENTS	105,700
AVERAGE NO. RESPONSES PER RESPONDENT	313.1744

TOTAL ANNUAL RESPONSES	33,102,536
AVERAGE HOURS PER RESPONSE	0.112881862
BURDEN REQUESTED WITH SBP REVISION	3,736,676

- **12b) 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 2021 National Occupational and Wage Statistics, Occupational Group (25-0000) (https://www.bls.gov/oes/current/oes_nat.htm#25-0000). The hourly mean wage (for education-related occupations) for functions performed by State agency and school administrating staff are estimated at \$27.51 per staff hour. To determine the total cost to the public, the burden hours for the collection is multiplied by the hourly mean wage discussed above ($\$27.51 \times 3,736,676$ hours), which results in an initial cost of \$102,795,956.76. An additional \$33,922,665.73 (33% of \$102,795,956.76) is then added to account for fully-loaded wages, which results in a total cost to the public of \$136,718,622.49.

13. 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 ongoing operation/maintenance costs for this collection of

information.

14. 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.

It is estimated that Federal employees receiving an average General Schedule (GS) grade 12 step 6 wage (\$50.22 hourly) based on the 2022 wage table for the Washington DC-Northern Virginia locality area take approximately 80 hours to analyze data received from State agencies, for an initial cost of \$4,017.6 ($\50.22×80 hours). To account for fully-loaded wages, an additional \$1,325.8 (33% of \$4017.6) is then added to the initial costs, resulting in an estimated annualized cost to the Federal Government of \$5,343.4.

15. Explanation of Program Changes or Adjustments.

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

This is a revision of a currently approved collection. The currently approved burden inventory for this collection is 3,857,770 hours and 34,049,729 responses. A change in the number of SFAs and schools participating in the program led to a decrease of 947,193 responses. The estimated annual burden is 3,736,676 hours, a decrease of 121,094 hours.

Adjustments were made as a result of the use of updated SBP participation data from fiscal year 2020, which demonstrated a decrease in SFAs (19,240 to 17,117) and schools/sites (90,972 to 88,527) that participate in the SBP. The decrease in SFAs administering the SBP decreased the SFA reporting burden from 192,759 hours to 171,472 hours, and the SFA record keeping burden from 15,969 hours to 14,207 hours. The decrease in eligible sites participating in the SBP decreased the site level reporting burden from 45,486 hours to 44,263.5 hours, and the site level record keeping data from 3,602,491 hours to 3,505,669 hours. These revisions estimate a total decrease in burden hours of 121,094 hours and a total decrease in responses of 947,193. These updates are due to a reported change in Program participation.

As a result, FNS estimates that this collection will have 3,736,676 burden hours and 33,102,536 responses.

16. 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.

17. 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.

18. 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."

There are no exceptions to the certification statement. The agency is able to certify compliance with all of the provisions of OMB Form 83-I.