

7 CFR Part 225 – Summer Food Service Program

OMB CONTROL NUMBER 0584-0280

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Attachments

- A. Burden Chart for OMB Control Number 0584-0280 7 CFR Part 225 – Summer Food Service Program (SFSP)
- B. Burden Narrative: Estimate of the Information Collection Burden (Narrative) for the 7 CFR Part 225 Summer Food Service Program (OMB# 0584-0280)
- C. Richard B. Russell National School Lunch Act
- D. Public Comment 60 Day Notice
- E. FNS Response to Public Comment 60 Day Notice
- F. SFSP Sample First Week Visit Form
- G. SFSP Sample Site Review Form
- H. Administration Guide for the Summer Food Service Program

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 is a revision of an existing information collection currently approved under OMB control number 0584-0280, 7 CFR Part 225 Summer Food Service Program (SFSP), and accounts for rounding issues and requirements left out of previous renewals and revisions of the SFSP information collection. Section 13 of the Richard B. Russell National School Lunch Act (NSLA), 42 U.S.C. § 1758, (Attachment C), authorizes SFSP for service of meals and snacks to children in low-income areas during the summer months. The collection of this information is required to administer and operate SFSP in accordance with the NSLA.

The SFSP is directed toward children in low-income areas when school is not in session and is administered by FNS in partnership with State agencies and local program sponsors. Approved sponsors may include public or private non-profit school food authorities (SFAs), public or private non-profit residential summer camps, units of local, municipal, county or State governments, or other private non-profit organizations that develop a special summer program and provide meal service similar to that available to children during the school year under the National School Lunch Program and the School

Breakfast Program. Under current regulations, sponsors are required to visit each of their sites at least once during the first week of operation under the program (7 CFR 225.15(d)(2)), and to conduct a full review of food service operations at each site within the first four weeks of operation ((7 CFR 225.15(d)(3)).

The existing requirements that are currently in use without PRA approval, which are being added as part of this revision, were identified during the review of the Final Rule, “Streamlining Program Requirements and Improving Integrity in the Summer Food Service Program (0584-AE72).” Since it was determined that the final rule would impact the burden for these requirements, FNS needed to publish a stand-alone 60-Day Notice to add these existing requirements into OMB# 0584-0280 in order to establish a new baseline for this collection that would include these requirements. Once the baseline is reviewed and approved by the Office of Management and Budget (OMB), FNS can then submit the Information Collection Request (ICR) describing the impacts resulting from the final rule.

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. The information that is required to be collected for the requirements added in this ICR is mandatory and completed by the sponsor annually. 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.

Under current regulations, sponsors are required to visit each of their sites at least once during the first week of operation under the program (7 CFR 225.15(d)(2)), and to conduct a full review of food service operations once at each site within the first four weeks of operation ((7 CFR 225.15(d)(3)). These annual requirements ensure program integrity and allow sponsors to correct operational issues at sites when discovered.

Operational issues may include missing required meal components or failure to comply with required portion sizes. In the case of missing required meal components or failure to comply with required portion sizes observed onsite, the sponsor would take action to correct the issue and note the deficiencies in their monitoring form. The sponsor would review the monitoring form with the site supervisor and keep the form on file electronically. The burden associated with these existing monitoring requirements was overlooked in previous ICRs and has not yet been approved under the Paperwork Reduction Act. This revision corrects these omissions. In addition, FNS is taking this opportunity to correct for rounding issues in the total estimated burden hours currently approved for the collection.

FNS estimates that each of the 5,524 sponsors that participate in SFSP (3,314 local and tribal government sponsors, and 2,210 business sponsors) complete, on average, nine first week site visit reports and nine food service reviews annually, for a total of 99,432 responses. In addition, FNS estimates that the average number of burden hours per response is 30 minutes (0.50 hours) for first week site visits, and two hours for food

service reviews, resulting in an estimated total of 124,290 additional burden hours annually (5,524 x 9 x 2.5). As a result of program changes for these two monitoring requirements, the reporting burden associated with this collection increases from 328,870 hours and 185,884 responses to 453,160 hours and 285,316 responses. These program changes do not affect the currently approved recordkeeping and public disclosure burdens because the recordkeeping burden for these requirements has already been accounted for in the currently approved recordkeeping burden.

Furthermore, in preparation for this ICR, FNS discovered rounding issues in the burden chart submitted as part of the previous renewal request, which resulted in an additional two hours to the total burden estimate for the collection. FNS found in the last renewal that the total public disclosure burden was entered as 1,395 hours when it should have more accurately been rounded to 1,394 hours. In addition, the total burden hours estimate for the collection was rounded up an additional hour when it should have been rounded down. Because of these two rounding issues, the current OMB inventory for this collection totals 338,411 hours rather than the more accurate total of 338,409 hours.

The changes outlined above facilitate compliance with program requirements. The burden narrative, which highlights the changes, can be found, with their CFR citations, in Attachment B. The burden associated with these changes are 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 53 SFSP State agencies submit required information electronically to FNS.

All program operation information and materials are available for download from the FNS website. FNS estimates that approximately 100 percent 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. FNS estimates that all of the information collection requirements associated with this change will be collected electronically through these State agency systems. Therefore, for the total 391,795 responses for this collection, FNS estimates 100 percent 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.

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. Certain local agencies and community organizations associated with SFSP meet the definition of “small entities” in the Regulatory Flexibility Act. Out of the total 5,524 sponsors (3,314 local and tribal government sponsors and 2,210 business sponsors) impacted by these changes, 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. Although smaller sponsors are involved in this information 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.

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. The requirements impacted are

mandatory as required by statute. FNS collects the monitoring information annually. 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. 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 titled “7 CFR Part 225, Summer Food Service Program,” was published in the Federal Register on July 23, 2021 (86 FR 38974). The comment period for the proposed changes in the information collection burden ended on September 23, 2021. FNS received one comment which was not germane. The comment can be found in attachment D and FNS response can be found in attachment E.

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.

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

FNS has engaged extensively with State agencies about the burden associated with program requirements which allow for effective oversight. FNS consulted with four State agencies regarding the change in burden for this collection. FNS specifically requested feedback from State agencies to help determine burden around the requirements for sponsors to visit each of their sites at least once during the first week of operation, and to conduct a full review of food service operations at each site within the first four weeks of operation. This feedback was taken into consideration for the information collection requirements and used to help shape the burden estimates for this collection. FNS received comments from four State agencies. Included in State agency comments were comments from:

- Kim Frinzell, Director, Nutrition Services Division, California Department of Education, kfrinzell@cde.ca.gov

- Matthew Anderson, Child Nutrition Programs Senior Specialist, Utah State Board of Education, matt.anderson@schools.utah.gov
- Leanne Eko, RD, Director, Child Nutrition Services, Washington, Office of Superintendent of Public Instruction, Leanne.eko@k12.wa.us
- Irene Sedlacko, Special Nutrition Program Coordinator, Massachusetts, Department of Elementary and Secondary Education, Irene.sedlacko@state.ma.us

The State agency comments mentioned the current regulations were burdensome to complete and cited various common circumstances, such as sites that are spread out geographically and difficult to visit within the required timeframe. Most State agencies also expressed concerns about the limited amount of time between the first week site visits and the visit which must be made within the first four weeks of operation. The limited time frame between the two required visits creates an increase in burden for sponsors. Although State agencies expressed concern around the burdensome nature related to the number and frequency of required visits, they did not have concerns around the amount of time required to conduct each visit. State agencies indicated that sponsors normally have many sites to visit in one day in order to meet the first week site visit requirement and cannot spend a lengthy amount of time at each site. FNS adjusted the burden estimates to reflect the limited amount of time sponsors spend at sites to meet the first week site visit requirement. FNS considered the number of sites sponsors are required to visit each day for the food service review, as well as the fact that it is more in depth, when determining the burden estimate. All State agencies expressed a firm commitment to continuing to ensure program integrity.

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.

USDA 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 ICR does not request any personally identifiable information, nor does it include any forms that require a Privacy Act Statement. This information collection request has been reviewed and cleared by FNS Privacy Officer, Michael Bjorkman, on July 15, 2022.

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature included in this information collection.

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

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form, and aggregate the hour burdens in Item 13 of OMB Form 83-I.

This is a revision to a currently approved information collection for OMB# 0584-0280, 7 CFR Part 225, Summer Food Service Program, which expires on December 31, 2022.

This revision includes previously omitted regulations at 7 CFR 225.15(d)(2), and 7 CFR 225.15(d)(3), which have been in use without OMB approval; these existing requirements are being added into the reporting burden and do not affect the recordkeeping burden.

The revision also corrects for a rounding error in the currently approved total estimated burden hours. The impact of the changes in burden due to a rounding error are minimal.

The burden estimates are presented in the summary tables below. The summary tables show the changes in the reporting burden due to existing requirements that are being added into the collection, first in a chart separated according to the affected regulations and then in a chart separated by respondent type, and the change in the total public disclosure burden due to rounding errors.

Previous Reporting Burden in Use Without OMB Approval
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Estimated Burden Changes to OMB 0584-0280					
Affected Public	Est. No. of Responses	No. of Responses per Respondent	Total Annual Responses (Records)	Est. total Hours per Response	Est. Total Burden
Reporting (addition of previously omitted requirements)					
Requirement/Activity: 225.15(d)(2) Sponsors must conduct a site visit during the first two weeks of operation under the program for new sites, sites with operational problems, and any site where the SA deems a visit is necessary.					
State/Local/Tribal Government Level (sponsors)	3,314	9	29,826	0.50	14,913
Requirement/Activity: 225.15(d)(3) Sponsors must conduct food service reviews for all sites within the first month of starting operations, and thereafter maintain a reasonable level of monitoring.					
State/Local/Tribal Government Level (sponsors)	3,314	9	29,826	2	59,652
State/Local/Tribal Government Level (sponsors) Total:	3,314	18	59,652	1.25	74,565
Requirement/Activity: 225.15(d)(2) Sponsors must conduct a site visit during the first two weeks of operation under the program for new sites, sites with operational problems, and any site where the SA deems a visit is necessary.					
Business Sponsors Level	2,210	9	19,890	0.50	9,945
Requirement/Activity: 225.15(d)(3) Sponsors must conduct food service reviews for all sites within the first month of starting operations, and thereafter maintain a reasonable level of monitoring.					
Business Sponsors Level	2,210	9	19,890	2	39,780
Business Sponsors Level Total:	2,210	18	39,780	1.25	49,725
Total Change in Reporting Burden:	5,524	18	99,432	1.25	124,290
Public Disclosure (revisions due to rounding issues)					
Requirement/Activity: 225.15(e) Per policy guidance, State agency can issue a media release on behalf of the sponsor.					
State/Local/Tribal Government Level	53	1	53	0.25	13
Requirement/Activity: 225.15(e) Each sponsor shall annually announce in the media serving the area from which it draws its attendance the availability of free meals.					

State/Local/Tribal Government Level	3,314	1	3,314	0.25	828
State/Local/Tribal Government Level Total:	3,367	1	3,367	0.25	841
Requirement/Activity: 225.15(e) Each sponsor shall annually announce in the media serving the area from which it draws its attendance the availability of free meals.					
Business Sponsors Level Total:	2,210	1	2,210	0.25	553
Estimated Public Disclosure Burden Total:	5,577	1	5,577	0.25	1,394
Total Burden for SFSP					
	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. Total Hours per Response	Est. Total Burden
Reporting (with changes)	63,942	4.46	285,316	1.59	453,159.55
Recordkeeping (no change)	5,577	18.09	100,902	0.08	8,145.42
Public Disclosure (with changes)	5,577	1	5,577	0.25	1,394
Total Burden for SFSP:	63,942	6.13	391,795	1.181	462,699

*Totals may differ due to rounding

FNS estimates that each of the 5,524 sponsors that participate in SFSP (3,314 local and tribal government sponsors, and 2,210 business sponsors) complete, on average, nine first week site visit reports and nine food service reviews annually, for a total of 99,432 responses. In addition, FNS estimates that the average number of burden hours per response is 30 minutes (0.50 hours) for first week site visits, and two hours for food service reviews, resulting in an estimated total of 124,290 additional burden hours

annually ($5,524 \times 9 \times 2.5$). As a result of program changes for these two monitoring requirements, the reporting burden associated with this collection increases from 328,870 hours and 185,884 responses to 453,160 hours and 285,316 responses. Furthermore, in preparation for this ICR, FNS discovered rounding issues in the burden chart submitted as part of the previous renewal request, which resulted in an additional two hours to the total burden estimate for the collection (the total public disclosure burden was entered as 1,395 hours when it should have more accurately been rounded to 1,394 hours). In addition, the total burden hour estimate for the collection was rounded up an additional hour when it should have been rounded down. Because of these two rounding issues, current OMB inventory for this collection totals 338,411 hours rather than the more accurate total of 338,409 hours.

As a result of the program changes and adjustments, due to the addition of previously omitted reporting requirements, as well as the administrative adjustment for rounding issues, FNS estimates the revised total burden for the collection to increase by 124,288 hours (124,290 for the two monitoring requirements - 2 to correct rounding issues) and 99,432 responses, to a total of 462,699 hours and 391,785 responses. The adjusted average burden per response and the annual burden hours for reporting, recordkeeping, and public disclosure are explained above. The charts reflect the changes in reporting burden at the State/Local/Tribal Government and Business Sponsors levels and the correction of rounding issues in the public disclosure burden. No changes were made in the recordkeeping burden.

Specific changes to the currently approved burden for OMB# 0584-0280 are explained

in the attached burden chart (attachment A).

**Estimated Annual Burden for 0584-0280, 7 CFR Part 225, Summer Food Service
Program**

OMB# 0584-0280 is currently approved with 63,942 respondents, 292,363 responses, and 338,411 burden hours. When adjusted to account for the existing requirements in use without OMB approval, FNS estimates the currently approved SFSP collection would include 63,942 respondents, 391,795 responses, and 462,699 burden hours. With this revision, FNS estimates that the total burden will increase by 124,288 hours. The burden table in Attachment A reflect the impact that the revision 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 changes can also be found in the Burden Narrative (Attachment B).

Estimated Annual Burden Change as a Result of the Revision

Affected Public: State, Local, or Tribal Governments and Businesses or Other For Profit, or Not for Profit. Respondent groups identified include State Agencies and local, tribal, and business sponsors, including non-profit institutions and camps.

Estimated Number of Respondents: 63,942

Estimated Number of Responses per Respondent: 6.13

Estimated Total Annual Responses: 391,795

Estimated Time Per Response: 1.18

Estimated Total Annual Burden: 462,699

Current OMB Inventory: 338,411

Difference (Burden Revisions Requested): 124,288

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 \$18,387,852.08.

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

(http://www.bls.gov/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 \$29.88 per staff hour.

TOTAL COST TO PUBLIC = 462,699.22 hours X \$29.88 per hour = \$ 13,825,452.69

To account for fully-loaded wages, an additional \$4,562,399.39 (33% of \$13,825,452.69) has been added to \$13,825,452.69 for a total respondent cost of \$18,387,852.08.

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 are no capital or start-up costs or ongoing 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. 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 total annualized cost to the Federal government for this information collection is \$1,131,889.16). 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.

FEDERAL COSTS OF SFSP - PERSONNEL				
FUNCTION	DONE BY	TOTAL STAFF HOURS	SFSP ALLOCATION PERCENTAGE	PORTION TO SFSP (3X4)
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
TOTAL				16,224

The 2022 Federal Wage Salary Tables 2022 General Schedule (GS) Locality Pay Tables for the Rest of the United States and the 2022 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/2022/general-schedule/>). FNS estimates the hourly wage rate is \$41.24 (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 \$50.22 (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 \$41.24/hour)	\$188,714.24
NO Salaries (11,648 hours x \$50.22/hour)	\$584,962.56
10 % for Administrative overhead (10% x \$773,676.80 = \$77,367.68)	\$773,676.8
Sub Total	\$851, 044.48
33% addition to account for fully loaded wages (33% x \$851,044.48)	\$280,844.68

Total Federal Cost	\$1,131,889.16
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A15. Explanation of Program Changes or Adjustments.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a revision of a currently approved information collection, OMB# 0584-0280, 7 CFR Part 225 Summer Food Service Program, which is currently approved with 292,363 responses and 338,411 burden hours. As a result of program changes, due to the addition of previously omitted reporting requirements that have been collected in violation of the Paperwork Reduction Act, and administrative adjustment for rounding issues, FNS estimates the revised total burden for the collection to increase by 124,288 hours (124,290 for the two monitoring requirements - 2 to correct rounding errors). FNS further estimates that the addition of the previously omitted reporting requirements will increase the responses by 99,432 responses. Once these revisions are approved, FNS estimates that this collection will have 462,699 hours and 391,795 responses. The specific burden changes for this information collection can be found in the burden narrative, 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 of the

OMB 83-i “Certification for Paperwork Reduction Act.”

There are no exceptions to the certification statement.