

Attachment B. Estimate of the Information Collection
Burden (Narrative) for OMB Control Number 0584-0006
7 CFR Part 210 National School Lunch Program

**Estimate of the Information Collection Burden for the
National School Lunch Program (OMB Control Number 0584-0006)**

This document explains the calculation of the information collection burden for the National School Lunch Program (NSLP) - 7 CFR Part 210, OMB Control 0584-0006.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Section 210.18(i)(3) requires SAs to provide written notification to school food authorities (SFAs) of review findings, corrective actions, deadlines for completion, and potential fiscal action with right to appeal. FNS estimates there are 56 SAs that will each file 113 reports annually for a total of 6,328 responses ($56 \times 113 = 6,328$). The estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 50,624 ($6,328 \times 8 = 50,624$). There is no change in burden.
2. Section 210.19(f) requires the SA to provide the Child and Adult Care Food Program (CACFP) SA with a list of all NSLP schools in which at least 50% of the children are eligible for free or reduced price meals. FNS estimates that 56 SAs will each file 1 report annually for an estimated number of responses of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per response is 2 hours resulting in estimated total annual burden hours of 112 ($56 \times 2 = 112$). There is no change in burden.
3. Section 210.20(a)(7) requires SAs to report to FNS the results of schools' compliance with the food safety inspection requirement (i.e., number of inspections). FNS estimates there are 56 SAs that will each file 1 report annually for a total of 56 responses ($56 \times 1 = 56$). The estimated average number of burden hours per response is 1.5 hours resulting in an estimated total annual burden hours of 84 ($56 \times 1.5 = 84$). There is no change in burden.
4. Section 210.5(d)(2)(ii) requires that SAs submit a quarterly report to FNS detailing the disbursement of performance-based reimbursement to SFAs. FNS estimates that there are 56 SAs that will each file 4 reports annually for a total of 224 responses ($56 \times 4 = 224$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 56 ($224 \times 0.25 = 56$). There is no change in burden.
5. Sections 210.18 (c-h) require the SA to complete Administrative Reviews. FNS estimates there are 56 SAs that will each file approximately 113 reports annually for a total of 6,347 responses ($56 \times 113.339 = 6,347$). The estimated average number of burden hours per response is 47.5 hours resulting in an estimated total annual burden hours of 301,482 ($6,347 \times 47.5 = 301,482$). There is no change in burden.

**AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs)/LOCAL EDUCATION
AGENCY(LEA)**

1. Section 210.9(b)(21) requires SFAs to provide the SA with a list of all schools with at least 50% of enrolled children determined eligible for free or reduced-price meals as of the last day

of October and, upon request, the attendance boundaries for those schools. FNS estimates 19,019 SFAs will each file 1.25 report annually for a total of 23,774 responses ($19,019 \times 1.25 = 23,774$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 5,943 ($23,774 \times 0.25 = 5,943$). There is no change in burden.

2. Section 210.9(c)(7) requires SFAs to conduct reviews of each afterschool care program that participates in the NSLP. FNS estimates 6,314 SFAs will each file 2 responses annually for a total of 12,628 responses ($6,314 \times 2 = 12,628$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 3,157 ($12,628 \times 0.25 = 3,157$). There is no change in burden.
3. Sections 210.15(a)(1) and 210.8(b)&(c) require SFAs to submit to the SA monthly claims for reimbursement and numbers of enrolled children by category for the month of October. FNS estimates 19,019 SFAs will each file 10.15 reports annually for a total of 193,043 responses ($19,019 \times 10.15 = 193,043$). The estimated average number of burden hours per response is 1 hour resulting in an estimated total annual burden hours of 193,043 ($193,043 \times 1 = 193,043$). There is no change in burden.
4. Sections 210.15(a)(2)&(4), 210.9(a)&(b), and 210.7(d)(2) require SFAs to submit an application to the SA for a school to operate the Program, specify commodity preference, and enter into an agreement with the SA, including an annual attestation of compliance with meal pattern and nutrition requirements. FNS estimates there are 19,019 SFAs that will each file 1 report annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). There is no change in burden.
5. Sections 210.15(a)(3) and 210.18(j)(2) require SFAs to submit to the SA a written response to reviews documenting corrective action taken for Program deficiencies. FNS estimates 6,340 SFAs will each file 1 report annually for a total of 6,340 responses ($6,340 \times 1 = 6,340$). The estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 50,720 ($6,340 \times 8 = 50,720$). There is no change in burden.
6. Section 210.15(a)(7) requires SFAs to report to the SA the number of food safety inspections obtained by each school. FNS estimates 19,019 SFAs will each file 1 report annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 30 minutes (0.50 hours) resulting in an estimated total annual burden hours of 9,510 ($19,019 \times 0.5 = 9,510$). There is no change in burden.
7. Sections 210.15(a)(8) and 210.14(e)(7) require SFAs to report to the SA the prices of paid lunches for each school. FNS estimates 19,019 SFAs will each file 1 report annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). There is no change in burden.

AFFECTED PUBLIC: SCHOOLS

Section 210.13(b) requires schools to post the most recent food safety inspection and provide a copy upon request. FNS estimates that 96,860 schools will each file 2 reports annually for a total

estimated number of responses of 193,720 ($96,860 \times 2 = 193,720$). The estimated average number of burden hours per response is 6 minutes (0.1002 hours) resulting in an estimated total annual burden hours of 19,411 ($193,720 \times 0.1002 = 19,411$). Because FNS has adjusted decimal conversions for the time estimates, this results in an increase of 39 burden hours, from 19,372 to 19,411 due to an adjustment.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. Section 210.18(h)(2)(iv) requires each SA to ensure that the LEA and SFA comply with the nutrition standards for all competitive food and maintain records documenting compliance. FNS estimates that 56 SAs will each maintain 113 records annually for a total estimated number of records of 6,328 ($56 \times 113 = 6,328$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 1,582 ($6,328 \times 0.25 = 1,582$). There is no change in burden.
2. Sections 210.20(b)(1)&(2), 210.23(c), and 210.5 require the SA to maintain accounting records and source documents to control the receipt, custody, and disbursement of Federal NSLP funds, including documentation to support all SFA claims paid by the SA (FNS-10). FNS estimates that 56 SAs will each file 340 reports annually for a total estimated number of records of 19,040 ($56 \times 340 = 19,040$). The estimated average number of burden hours per record is 3 hours resulting in an estimated total annual burden hours of 57,120 ($19,040 \times 3 = 57,120$). There is no change in burden.
3. Sections 210.20(b)(3) and 210.17(g)&(h) require the SA to maintain documentation to support the amount of State funds reported (FNS-13) for State revenue matching requirements. FNS estimates that 56 SAs will each file 1 report annually for a total estimated number of records of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per record is 1 hour resulting in an estimated total annual burden hours of 56 ($56 \times 1 = 56$). There is no change in burden.
4. Sections 210.20(b)(6), 210.18(o)(f)(k)(l)(m), and 210.23(c) require the SA to maintain records of all reviews and audits (including Program violations, corrective action, fiscal action, and withholding of payments). FNS estimates that there are 56 SAs that will each file 113 records annually for a total of 6,328 records ($56 \times 113 = 6,328$). The estimated average number of burden hours per record is 8.00214 hours resulting in an estimated total annual burden hours of 50,638 hours ($6,328 \times 8.00214 = 50,638$). There is no change in burden.
5. Sections 210.20(b)(7), 210.19(c), and 210.18(o) require the SA to document fiscal action taken to disallow improper claims submitted by SFAs, as determined through claims processing, reviews, and audits. FNS estimates that there are 56 SAs that will each file 113 records annually for a total of 6,328 records ($56 \times 113 = 6,328$). The estimated average number of burden hours per record is 30 minutes (0.50 hours) resulting in an estimated total annual burden hours of 3,164 hours ($6,328 \times 0.5 = 3,164$). There is no change in burden.
6. Sections 210.18 (c-h) require the SA to maintain documentation used to conduct Administrative Reviews. FNS estimates there are 56 SAs that will each file approximately 113 reports annually for a total of 6,347 responses ($56 \times 113.339 = 6,347$). The estimated

average number of burden hours per response is 30 minutes (0.50 hours) resulting in an estimated total annual burden hours of 3,173 ($6,347 \times 0.5 = 3,173$). There is no change in burden.

7. Sections 210.20(b)(10) and 210.19(b) require the SA to maintain records on the annual food preference survey of SFAs and prepare and forward to the SA distributing agency information on schools eligible to receive USDA donated foods. FNS estimates that 56 SAs will each file 1 report annually for an estimated number of responses of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per response is 3 hours resulting in an estimated total annual burden hours of 168 ($56 \times 3 = 168$). There is no change in burden.
8. Section 210.20(b)(11) requires SAs to maintain records supplied by SFAs of food safety inspections obtained by schools. FNS estimates that 56 SAs will each file 340 reports annually for a total estimated number of responses of 19,040 ($56 \times 340 = 19,040$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in estimated total annual burden hours of 4,760 ($19,040 \times 0.25 = 4,760$). There is no change in burden.
9. Sections 210.20(b)(12) and 210.14(e)(7) require SAs to maintain records of paid reimbursable lunch prices obtained from SFAs (FNS-828). FNS estimates that 56 SAs will each file 340 reports annually for a total estimated number of responses of 19,040 ($56 \times 340 = 19,040$). The estimated average number of burden hours per record is 12 minutes (0.2004 hours) resulting in estimated total annual burden hours of 3,816 ($19,040 \times 0.2004 = 3,816$). Because FNS has adjusted decimal conversions for the time estimates, this results in an increase of 8 burden hours, from 3,808 to 3,816, due to an adjustment.
10. Section 210.20(b)(14) requires SAs to maintain records to demonstrate compliance with the professional standards for State directors of school nutrition programs. FNS estimates that 56 State agencies will each file 1 record annually for a total estimated number records of 56 ($56 \times 1 = 56$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 14 ($56 \times .25 = 14$). There is no change in burden.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs) and LOCAL EDUCATION AGENCIES (LEAs)

1. Section 210.9(b)(19) requires SFAs to maintain names of children currently approved for free meals through direct certification with supporting documentation. FNS estimates that 19,019 SFAs will each file 4 reports annually for a total estimated number of records of 76,076 ($19,019 \times 4 = 76,076$). The estimated average number of burden hours per record is 39 minutes (0.6513 hours) resulting in an estimated total annual burden hours of 49,548 ($76,076 \times 0.6513 = 49,548$). Because FNS has adjusted decimal conversions for the time estimates, this results in an increase of 99 hours, from 49,449 to 49,548, due to an adjustment.
2. Section 210.11(b)(2) requires LEAs and SFAs to be responsible for maintaining records documenting compliance with the nutrition standards for all competitive food available for sale to students. FNS estimates that 19,019 SFAs will each file 1 record annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number

of burden hours per record is 20 hours resulting in an estimated total annual burden hours of 380,380 ($19,019 \times 20 = 380,380$). There is no change in burden.

3. Sections 210.15(b)(1) and 210.8(a)(5) require SFAs to maintain documentation of participation data by school, each month's Claim for Reimbursement, and all data used in the claims review process. FNS estimates that 19,019 SFAs will each file 10 records annually for a total estimated number of records of 190,190 ($19,019 \times 10 = 190,190$). The estimated average number of burden hours per record is 5 hours resulting in an estimated total annual burden hours of 950,950 ($190,190 \times 5 = 950,950$). There is no change in burden.
4. Sections 210.15(b)(2) and 210.7(d)(2) require SFAs to maintain production and menu records and documentation to support performance-based cash assistance and the attestation of compliance. FNS estimates that 19,019 SFAs that will each file 1 record annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). There is no change in burden.
5. Sections 210.15(b)(4) and 210.9(b)(18&20) require SFAs to maintain currently approved and denied applications for free and reduced priced meals. FNS estimates that 19,019 SFAs will each file 1 record annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimate average number of burden hours per record is 2 hours and 40 minutes (2.66 hours) resulting in estimated total annual burden hours of 50,591 ($19,019 \times 2.66 = 50,591$). There is no change in burden.
6. Sections 210.15(b)(6) and 210.14(e) require SFAs to maintain records to document compliance with reporting lunch prices to the SA. FNS estimates that 19,019 SFAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 5 hours resulting in an estimated total annual burden hours of 95,095 ($19,019 \times 5 = 95,095$). There is no change in burden.
7. Sections 210.15(b)(7) and 210.14(f) require SFAs to maintain records to document compliance with revenue from nonprogram foods. FNS estimates that 19,019 SFAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 10 hours resulting in an estimated total annual burden hours of 190,190 ($19,019 \times 10 = 190,190$). There is no change in burden.
8. Sections 210.15(b)(8) and 210.30(g) require SFAs to maintain records to demonstrate compliance with the professional standards for school nutrition program directors, managers and personnel. FNS estimates that 19,019 SFAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). There is no change in burden.
9. Sections 210.15(b)(9) and 210.31(f) require SFAs/LEAs to maintain records documenting compliance with the local school wellness policy requirements. FNS estimates that 19,019 SFAs/LEAs will each file 1 report annually for a total estimated number of records of 19,019 ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per record is 15

minutes (0.25 hours) resulting in an estimated total annual burden hours of 4,755 ($19,019 \times 0.25 = 4,755$). There is no change in burden.

AFFECTED PUBLIC: SCHOOLS

1. Section 210.10(m) requires schools to maintain written statements signed by a licensed physician of the need for substitutions recommending alternate foods unless otherwise exempted by FNS. FNS estimates that 29,058 schools will each file 1 record annually for a total estimated number of records of 29,058 ($29,058 \times 1 = 29,058$). The estimated average number of burden hours per record is 5 minutes (0.0835 hours) resulting in an estimated total annual burden hours of 2,426 ($29,058 \times 0.0835 = 2,426$). Because FNS has adjusted decimal conversions for the time estimates, this results in an increase of 101 burden hours, from 2,325 to 2,426, due to adjustment.
2. Section 210.11(b)(2) requires that organizations responsible for food service at various venues in schools maintain records. FNS estimates that 96,860 schools will each file 1 record annually for a total estimated number of records of 96,860 ($96,860 \times 1 = 96,860$). The estimated average number of burden hours per response is 30 minutes (0.5 hours) resulting in estimated total annual burden hours of 48,430 ($96,860 \times 0.5 = 48,430$). There is no change in burden.
3. Section 210.15(b)(1) requires SFAs or schools to maintain records of participation data by school in support of the Claim for Reimbursement. FNS estimates that 96,860 schools will each file 180 reports annually for a total estimated number of responses of 17,434,800 ($96,860 \times 180 = 17,434,800$). The estimated average number of burden hours per response is 9 minutes (.15 hours) resulting in estimated total annual burden hours of 2,615,220 ($17,434,800 \times 0.15 = 2,615,220$). There is no change in burden.
4. Sections 210.15(b)(2) (3) and 210.10(a)(3) require schools or SFAs to maintain production, menu, and the latest nutritional analysis records to show that meals meet requirements. FNS estimates that 96,860 schools will each file 180 reports annually for a total estimated number of responses of 17,434,800 ($96,860 \times 180 = 17,434,800$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in estimated total annual burden hours of 4,358,700 ($17,434,800 \times 0.25 = 4,358,700$). There is no change in burden.
5. Sections 210.15(b)(5) and 210.13(b)&(c) require schools to maintain temperature records for food safety program and records from the most recent food safety inspection. FNS estimates that 96,860 schools will each file 120 reports annually for a total estimated number of responses of 11,623,200 ($96,860 \times 120 = 11,623,200$). The estimated average number of burden hours per response is 1 minute (0.02 hours) resulting in estimated total annual burden hours of 232,464 ($11,623,200 \times 0.02 = 232,464$). There is no change in burden.

PUBLIC NOTIFICATION REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Section 210.18(m)(1) requires SAs to make the most recent final administrative review results available to the public in an easily accessible manner (by posting a summary to the SA website and make a copy available upon request). FNS estimates there are 56 SAs that will

each file 113 reports annually for a total of 6,328 responses ($56 \times 113 = 6,328$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 1,582 ($6,328 \times 0.25 = 1,582$). There is no change in burden.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFAs) and LOCAL EDUCATION AGENCIES (LEAs)

1. Section 210.31(d)(2) states that each LEA is required to inform the public annually about the local school wellness policy content and implementation and make any updates available to the public. FNS estimates that there are 19,019 LEAs that will each submit 1 public disclosure annually for a total of 19,019 responses ($19,019 \times 1 = 19,019$). The estimated average number of burden hours per response is 1 hour resulting in an estimated total burden hours of 19,019 ($19,019 \times 1 = 19,019$). There is no change in burden.
3. Section 210.31(d)(3), (e)(2), and (e)(3) state that each LEA is required to conduct triennial assessments and make results available to the public and make updates and modifications to policies as needed. FNS estimates that there are 6,340 LEAs ($19,019/3$) that will each submit 1 public disclosure annually, since this assessment occurs once every three years, for a total of 6,340 responses. The estimated average number of burden hours per response is 5 hours resulting in an estimated total burden hours of 31,700 ($6,340 \times 5 = 31,700$). There is no change in burden.