

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0006:**

**7 CFR PART 210 NATIONAL SCHOOL LUNCH PROGRAM  
REVISION OF A CURRENTLY APPROVED COLLECTION**

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- C. Form FNS-640 Administrative Review Data Report (OMB# 0584-0594)
- D. OMB# 0584-0594 Food Programs Reporting System (FPRS) Home Screen with OMB Information and Public Burden Statement
- E. Form FNS-10 Report of School Operations (OMB# 0584-0594)
- F. Form FNS-13 Annual Report of State Revenue Matching (OMB# 0584-0594)
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- I. Child Nutrition Act of 1966 (42 U.S.C. 1779)
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O. Public Comment

**Terms of Clearance:**

During the previous renewal of this collection, which was approved on July 14, 2020, OMB provided the following terms of clearance as part of the approval: “FNS may update its address as a de minimis change in this collection. In connection with its next revision, extension, or reinstatement request, USDA should consider opportunities to further reducing burden, including those mentioned in public comments received after the initial 60 Federal Register Notice process.”

FNS did not receive public comments after the initial 60-Day Federal Register Notice process, to further reduce burden. FNS continues to consider opportunities through engaging with stakeholders through meetings and through providing technical assistance.

**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 the currently approved information collection for the National School Lunch Program Part 210, associated with OMB Control Number 0584-0006. Section 10 of the Child Nutrition Act of 1966 (42 U.S.C. 1779) (Attachment I) requires the Secretary of Agriculture to prescribe such regulations as deemed necessary to carry out this Act and the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1751 et seq.) (Attachment J). The NSLA, as amended, authorizes the National School Lunch Program (NSLP) to safeguard the health and well-being of the Nation's children and provide free or reduced-price school lunches to eligible students through subsidies to schools. As required, the Secretary of Agriculture issued 7 CFR Part 210 (Attachment K), which sets forth policies and procedures

for the administration and operation of the NSLP. The United States Department of Agriculture (USDA) provides States with general and special cash assistance and donations of foods to assist schools in serving nutritious lunches to children each school day. School Food Authorities (SFAs)/ Local Educational Agencies (LEAs) must maintain records and file reports to their respective State agency. Participating schools must serve lunches that are nutritionally adequate and maintain menu and production records to demonstrate compliance with the meal requirements. This information collection is required to administer and operate this program in accordance with the NSLA.

## **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.**

This information is required to administer and operate the NSLP in accordance with the NSLA. Information received from the current collection is used in this way. The Seamless Summer Option and the Afterschool Care Snack Program are included in the burden in this information collection. State agencies, SFAs/LEAs, and schools are required to meet reporting, recordkeeping, and public notification requirements in order to obtain/retain benefits. They are required to respond in order to retain benefits. The information collection ranges in frequency from monthly to every three years. These requirements are explained in the “Estimate of the Information Collection Burden for the National School Lunch Program (OMB Control Number 0584-0006)” located in Attachment B. The Program is administered at the State agency and SFA levels, and the Act requires that State agencies, SFAs, and schools maintain accounts and records as may be necessary to enable FNS to determine whether the program is in compliance with this Act and the regulations. State agencies are

required to report program data to FNS using FNS forms. Some of this reporting burden is captured on forms that are completed and submitted via the Food Programs Reporting System (FPRS), which is approved under the information collection for the Food Programs Reporting System (FPRS), OMB Control #0584-0594. This reporting burden is not duplicated in this information collection; however, any recordkeeping burden associated with these forms is still maintained in this collection. Copies of these FPRS forms are provided as part of this ICR for reference purposes only. FNS publicly shares data on total number of participants, the number of lunches served, the amount of cash payments made to States, and the USDA Foods costs of each State. Unless otherwise noted, all other data is not shared outside of FNS.

### **State Agencies**

State agencies have reporting, recordkeeping, and public notification requirements they must meet in order to administer the NSLP. The information collected is used to ensure FNS can properly monitor State agency, SFA, and school compliance and to inform USDA policy making.

Current statutory and regulatory provisions require State agencies to conduct an administrative review of each SFA participating in the school meals programs at least once during a 3-year review cycle. This comprehensive review, outlined at 7 C.F.R. 210.18, monitors compliance with eligibility, meal counting and claiming, and meal pattern requirements among additional Program requirements. The administrative review consists of an off-site and on-site review that State agencies complete in order to conduct the monitoring. State agencies use an FNS developed manual, forms, and tools to carry out this review. This generates recordkeeping requirements to maintain documentation of information used to conduct reviews, LEA/SFA compliance with regulations, and records of the results of all

reviews (including Program violations, corrective action, fiscal action, and withholding of payments) (Attachment C Form FNS-640 Administrative Review Data Report). The burden associated with completing the FNS-640 can be found in OMB Control Number 0584-0594 Food Programs Reporting System (FPRS), expiration date 7/31/2023. The administrative review is a required oversight process used, regardless of the reporting requirements of the FNS-640; therefore, all burden apart from the burden to fill out the FNS-640 is included in this information collection.

Administrative reviews also include a reporting requirement for State agencies. State agencies must notify SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with grounds and the right to appeal. Additionally, State agencies are required to make the most recent final administrative review results available to the public in an easily accessible manner. This public notification regulation requires state agencies to publish results for each SFA every three years. The burden for conducting oversight of the programs through the administrative review consists of the time it takes for the State agency to conduct the off-site portion of the review, which includes scheduling of the review and the completion of the Off-site Assessment, Resource Management Risk Indicator, and Site Selection Tools. This burden also consists of the State agency conducting the on-site review of critical and general areas of the review and all additional applicable forms. FNS has attached the Administrative Review Manual to show the procedures State agencies follow during reviews (Attachment M). The forms that are used in the Administrative Review process are also included (Attachments N.1 through N.25).

State agencies receive occasional management evaluations from FNS. For these reviews,



State agencies must annually maintain:

- records and source documents to control the receipt, custody, and disbursement of Federal NSLP funds;
- documentation supporting all SFA claims paid by the State agency (Attachment E Form FNS-10 Report of School Operations, OMB# 0584-0594) and the reported amount of State funds used for State revenue matching requirements (Attachment F Form FNS-13 Annual Report of State Revenue Matching, OMB# 0584-0594);
- records from SFAs of food safety inspections obtained by school;
- records of paid reimbursable lunch prices obtained from SFAs (Attachment G Form FNS-828 School Food Authority Paid Lunch Price Report, OMB# 0584-0594);
- records on schools eligible to received USDA donated foods; and
- documentation of compliance with professional standards for State directors of School Nutrition Programs.

State agencies also are required to report a list of all NSLP schools with at least 50% or more children eligible for free or reduced price meals by February 1 each year to the State agency that administers the Child and Adult Care Food Program (CACFP) in their State. State agencies, too, must maintain records on the annual food preference survey of SFAs and prepare and forward to the State agency distributing agency information on schools eligible to receive USDA donated foods. State agencies also must submit a quarterly report to FNS detailing the disbursement of performance based reimbursement to SFAs.

## **School Food Authorities/Local Educational Agencies**

SFAs must meet reporting, recordkeeping, and public notification requirements in order to participate in the NSLP and to receive timely reimbursement.

SFAs are required annually to report to their State agency:

- the number of safety inspections obtained by each school;
- a list of all schools with at least 50% free or reduced price enrolled children (and the attendance boundaries for those schools upon request of a CACFP sponsor of homes);
- copies of their application, agreement, Free and Reduced Price Policy Statement, commodity preference, and annual certifications;
- the results of their review of NSLP afterschool care programs; and
- prices of paid lunches for each school.

Additionally, SFAs must submit monthly claims for reimbursement and eligibility data for enrolled children for October to their State agency. SFAs also must submit to their State agencies a written response to reviews documenting corrective action for Program deficiencies. For all requirements listed above, data is submitted through electronic State systems. The data collected by State agencies is used for State agency submissions to FNS, so the forms used by State agencies contain many of the same elements used in the FNS-10, FNS-640, FNS-777, and FNS-828.

SFAs are required to annually maintain certain records so that State agencies may review them for compliance during an administrative review. These recordkeeping requirements include:

- documentation of children who are directly certified (maintained quarterly);
- compliance with nutrition standards for all competitive food for sale to students;
- participation data by school to support monthly claims for reimbursement and data used in the claims review process (maintained each month the NSLP is operating);
- documentation to support performance-based reimbursement and the attestation of compliance;
- files of school meal applications;
- calculations of average paid lunch prices and adjustments;
- documentation showing revenue from the sale of nonprogram foods accrues to the nonprofit school food service account and is compliant with requirements;
- documentation of compliance with professional standards for school nutrition directors, managers, and personnel; and
- records to document compliance with the local school wellness policy requirements.

Local educational agencies (LEAs) have annual public notification requirements that are necessary to inform the public about the content and implementation of the local school wellness policy and any updates. LEAs must conduct triennial assessments of schools' compliance with the local school wellness policy and inform the public about progress.

## **Schools**

Schools must meet certain requirements to participate in the NSLP and in order to receive reimbursement. This data is collected so that it may be reviewed by State agencies during administrative reviews and so that timely reimbursement can be provided.

Twice a year, schools must post their most recent food safety inspection, and they must provide a copy upon request. Schools also maintain:

- records of written statements signed by a licensed physician of the need for substitutions and recommending alternate foods;
- records related to competitive foods;
- documentation of participation data by school to support the Claim for Reimbursement;
- production, menu, and the latest nutritional analysis records to show that meals meet requirements;
- food safety records; and
- records from the most recent food safety inspection.

These records are inspected during on-site administrative reviews.

There have been no changes to this collection since the last renewal other than an adjustment for decimal conversions. FNS has adjusted the decimal conversions for the time estimates for some of the information requirements to keep the conversions consistent across its collections. This has resulted in a slight increase of 247 hours. There have been no other changes to this collection, due to the pandemic.

### **A3. 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. All 56 State agencies that administer the NSLP submit some Program and financial data to FNS electronically via the Food Programs Reporting System (FPRS), at <https://www.FPRS.usda.gov>, using the following forms, which are included in the FPRS information collection, OMB Control Number 0584-0594:

- FNS-10, Report of School Program Operations;
- FNS-13 State Revenue Matching Requirement Report;
- FNS-640 Administrative Review Report
- FNS-777, Financial Status Report; and
- FNS-828, School Food Authority Paid Lunch Price Report.

State agencies collect participation and meal count data from SFAs via their own electronic systems. Out of the estimated 47,631,996 responses for this collection, FNS estimates that 4% (1,905,280 responses) of the information submitted in this collection is collected non-electronically. FNS estimates that 45,726,716 responses are collected electronically. The non-electronic submissions are due to requirements that cannot be met electronically as they require observations of NSLP meal service and on-site inspections. The methods of data submission used for this collection are intended to ease the burden on State agencies, SFAs, and schools to the extent possible while still maintaining high levels of program integrity. FNS engages in regular communication, outreach, and technical assistance to assist State agencies and SFAs with mitigating any challenges and better facilitating the process for

reporting, recordkeeping, and public notification. Every piece of information to be reported is essential for submittal and has been simplified as much as possible. Record retention requirements for this burden collection are in accordance with regulations. Reporting is required in the smallest frequency as possible, and requested information is not duplicated in other parts of the program.

**A4. Efforts to identify duplication.**

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

There is no similar data collection available. FNS is the sole agency that administers and monitors the NSLP. 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. However, SFAs, LEAs, 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 99.6% or 115,499 of the 115,935 respondents (approximately 18,639 of the SFAs and all of the 96,860 schools) are small entities. Although smaller SFAs/schools record fewer financial transactions, they deliver the same program benefits and perform the same functions as larger SFAs/ schools. Thus, they maintain the same types of information 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.**

The information is collected for the purpose of administering a data collection for this program, which is required to obtain or retain benefits, as stated in statute. Applications can be accepted and agreements executed at any time, although generally these occur shortly before the beginning of a school year. SFAs submit claims for reimbursement for every month they operate, because funds for NSLP are budgeted on a fiscal year basis. If the data is collected less frequently, FNS would not be able to properly fund Programs, ensure program integrity, or monitor funding and program trends.

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

**Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**

State agencies submit monthly reports via FPRS on the FNS-10 to receive timely reimbursement. SFAs may submit claims less frequently than monthly, but must submit claims, at the latest, 60 days following the last day of the full month covered by the claim. State agencies may establish shorter deadlines at their discretion. Claims not postmarked and/or submitted within 60 days are not paid with Program funds unless FNS determines that an exception should be granted.

- **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.

#### **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 notice titled Agency Information Collection Activities: Proposed Collection; Comment Request – Information Collection for the National School Lunch Program (0584-0006) was published in the Federal Register (88 FR 29627) on May 8, 2023. The comment period for the Information Collection ended July 7, 2023. FNS received one comment via email on May 8, 2023 in response to the notice. The comment was not relevant to the necessity of the information collection, the practical utility (or usefulness) to achieve the stated objectives, or to the costs, estimated time to complete the collection, the burden, frequency of collection, or the method of collection, so FNS did not reply to the comment.

**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.**

Stakeholders such as State agencies have been consulted concerning this information collection. This includes Jennifer Jarrett, School Nutrition Education & Program Manager, Pennsylvania Department of Education (717-783-2989; [jejarrett@pa.gov](mailto:jejarrett@pa.gov)); Carla Bankes, Child Nutrition Programs State Director, Wyoming Department of Education (307-777-6263; [carla.bankes@wyo.gov](mailto:carla.bankes@wyo.gov)); and Vonda Ramp, State Director, Pennsylvania Department of Education (717-783-6556; [vramp@pa.gov](mailto:vramp@pa.gov)). FNS did not receive feedback from these stakeholders.

**A9. 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.

**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. For the 60-day notice for this information collection request, the FNS Privacy

Officer cleared this ICR on February 3, 2023. There were no comments from the Privacy Officer.

**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 of the currently approved collection. This collection will have 115,935 respondents, 47,631,996 responses, and 9,808,701 burden hours. The number of respondents for this collection is 115,935. This includes 56 SAs+ 19,019 SFAs/LEAs + 96,860 Schools. The total number of annual responses for this request is 47,631,996 (this includes 499,573 total annual responses for reporting + 47,100,736 total annual responses for recordkeeping + 31,687 total annual responses for public notification). The total requested burden hours for this revision is 9,808,701 (this includes 643,651 for reporting + 9,112,749 for recordkeeping + 52,301 for public notification). The following tables and Attachments A and B reflect the estimated burden associated with this information collection for each type of respondent:

**ESTIMATED ANNUAL BURDEN FOR 0584-0006, NATIONAL SCHOOL LUNCH PROGRAM – 7 CFR PART 210 – REVISION OF AN APPROVED COLLECTION**

## Reporting

Reporting													
				A	B	C = (A*B)	D	E= (C*D)	F				G =E-F
Program Rule	CFR Citation	Title	Form #	Est. # Respondents	Responses per Respondents	Total Annual Records	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Current OMB Approved Burden Hrs	Existing Requirements in Use without OMB approval	Due to Program Change	Due to an Adjustment	Total Difference
<b>State Agency Level</b>													
	210.18(i)(3)	SA notifies SFAs in writing of review findings, corrective actions, deadlines, and potential fiscal action with grounds and right to appeal.		56	113	6,328	8.00	50,624	50,624	0	0	0	0

	210.19(f)	SA provides the CACFP SA with a list of all NSLP schools with at least 50% or more children eligible for free or reduced price meals by February 1 each year.	56	1	56	2.00	112	112	0	0	0	0
	210.20(a)(7)	SA reports to FNS schools' compliance with the food safety inspections requirements.	56	1	56	1.50	84	84	0	0	0	0
	210.5(d)(2)(ii)	SAs submit a quarterly report to FNS detailing the disbursement of performance-based reimbursement to SFAs.	56	4	224	0.25	56	56	0	0	0	0

Admin Review	210.18 (c-h)	SA completes documentation used to conduct Administrative Review.		56	113	6,347	47.50	301,482	301,482	0	0	0	0
	210.20(a)(2)&(3)&(4)&(8)&(9) & 210.5(d)(1)&(2) & 210.14(e)(7) & 210.17(g), 210.20(a)(5) & 210.18(n) & (o)(2)	SA reporting burden for electronic reports accounted for in the Food Program Reporting System (FPRS) ICR #0584-0594.	FNS-10, FNS-13, FNS-777, FNS-640, FNS-828										
*		<b>State Agency Level Total</b>		56	232.34	13011	27.08	352358	352358	0	0	0	0
<b>School Food Authority/Local Education Agency Level</b>													
	210.9(b)(21)	SFA provides SA with list of all schools with at least 50% free or reduced-price enrolled children and		19,019	1.25	23,774	0.25	5,943	5,943	0	0	0	0

		the attendance boundaries for those schools upon request of a CACFP sponsor of homes.											
	210.9(c)(7)	SFAs review NSLP afterschool care programs		6,314	2	12,628	0.25	3,157	3,157	0	0	0	0
	210.15(a)(1) & 210.8(b)&(c)	SFA submits to the SA monthly claims for reimbursement and eligibility data for enrolled children for October.		19,019	10.15	193,043	1.00	193,043	193,043	0	0	0	0
	210.15(a)(2)&(4) & 210.9(a&b) & 210.7(d)(2)	SFA submits to the SA an application, agreement, Free and Reduced Price Policy		19,019	1	19,019	0.25	4,755	4,755	0	0	0	0

		Statement, commodity preference, and annual certifications .											
	210.15(a)(3) & 210.18(j)(2)	SFA submits to the SA a written response to reviews documenting corrective action for Program deficiencies.	6,340	1	6,340	8.00	50,720	50,720	0	0	0	0	
	210.15(a)(7)	SFA reports to the SA the number of safety inspections obtained by each school.	19,019	1	19,019	0.50	9,510	9,510	0	0	0	0	
Paid Lunch Revenue	210.15(a)(8) & 210.14(e)(7)	School food authorities shall report prices of paid lunches for each school to the State agency.	19,019	1	19,019	0.25	4,755	4,755	0	0	0	0	

*		<b>School Food Authority Level Total</b>	19,019	15.397	292,842	0.928	271,882	271,882	0	0	0	0	
<b>School Level</b>													
	210.13(b)	Schools shall post the most recent food safety inspection and provide a copy upon request.	96,860	2	193,720	0.10	19,411	19,372	0	0	39	39	
*		<b>School Level Total</b>	96,860	2.000	193,720	0.10	19,411	19,372	0	0	39	39	
		<b>Total Reporting Burden</b>	115,935	4.31	499,573	1.29	643,651	643,612	0	0	39	39	

## Recordkeeping

Recordkeeping													
			A	B	C = (A*B)	D	E = (C*D)	F	G = E-F				
Program Rule	CFR Citation	Title	Form #	Estimated # Recordkeepers	Records Per Recordkeeper	Total Annual Records	Est. Avg. # of Hours Per Record	Estimated Total Hours	Current OMB Approved Burden Hrs	Existing Requirements in Use without OMB approval	Due to Program Change - Rule	Due to an Adjustment	Total Difference
<b>State Agency Level</b>													
Competitive	210.18(h)(2)	SA maintains		56	113	6,328	0.25	1,582	1,582	0	0	0	-



Foods	(iv)	documentation of LEA/SFA compliance with nutrition standards for competitive foods.											
FNS-10	210.20(b)(1&2) & 210.23(c) & 210.5	SA maintains accounting records and source documents to control the receipt, custody and disbursement of Federal NSLP funds and documentation supporting all SFA claims paid by the SA.	FNS-10	56	340	19,040	3.00	57,120	57,120	0	0	0	-
FNS-13	210.20(b)(3) & 210.17(g)&(h)	SA maintains documentation to support the amount of State funds reported for State revenue matching requirements.	FNS-13	56	1	56	1.00	56	56	0	0	0	-
Admin Review	210.20(b)(6) & 210.18(f)(k,l,m,(o) & 210.23(c)	SA maintains records of all reviews (including Program violations, corrective action, fiscal action and withholding of payments).	FNS-640	56	113	6,328	8.00	50,638	50,638	0	0	0	-
Admin Review	210.20(b)(7) & 210.19(c) & 210.18(o)	SA maintains documentation of fiscal action taken to		56	113	6,328	0.50	3,164	3,164	0	0	0	-

		disallow improper claims submitted by SFAs, as determined through claims processing, reviews, and USDA audits.											
Admin Review	210.18 (c-h)	SA completes and maintains documentation used to conduct Administrative Review.		56	113	6,347	0.50	3,173	3,173	0	0	0	-
	210.20(b) (10) & 210.19(b)	SA shall prepare records on schools eligible to receive USDA donated foods and maintain records on the annual food preference survey.		56	1	56	3.00	168	168	0	0	0	-
	210.20(b) (11)	SA maintains records from SFAs of food safety inspections obtained by schools.		56	340	19,040	0.25	4,760	4,760	0	0	0	-
Paid Lunch Revenue	210.20(b) (12) & 210.14(e)(7)	SA maintains records of paid reimbursable lunch prices obtained from SFAs.	FNS-828	56	340	19,040	0.20	3,816	3,808	0	0	8	8
Professional Standards	210.20(b) (14)	SA maintains documentation of compliance with professional standards for State		56	1	56	0.25	14	14	0	0	0	-

		directors of School Nutrition Programs.											
*		<b>State Agency Level Total</b>		56	1,475	82,619	1.51	124,491	124,483	0	0	8	8
<b>School Food Authority/Local Education Agency Level</b>													
	210.9(b)(19)	SFA maintains files of children directly certified.		19,019	4	76,076	0.65	49,548	49,449	-	-	99	99
Competitive Foods	210.11(b)(2)	LEAs & SFAs maintain documentation of compliance with nutrition standards for all competitive food for sale to students.		19,019	1	19,019	20.00	380,380	380,380	-	-	-	-
	210.15(b)(1) & 210.8(a)(5)	SFA maintains documentation of participation data by school to support monthly Claim for Reimbursement and data used in the claims review process.		19,019	10	190,190	5.00	950,950	950,950	-	-	-	-
Six Cents Certification	210.15(b)(2) & 210.7(d)(2)	SFAs maintain documentation to support performance based reimbursement and the attestation of compliance.		19,019	1	19,019	0.25	4,755	4,755	-	-	-	-
	210.15(b)(4) & 210.9(b)(18 & 20)	SFA maintains files of school meal applications.		19,019	1	19,019	2.66	50,591	50,591	-	-	-	-

Paid Lunch Revenue	210.15(b)(6) & 210.14(e)	SFA maintains calculations of average paid lunch prices and adjustments.		19,019	1	19,019	5.00	95,095	95,095	-	-	-	-
Paid Lunch Revenue	210.15(b)(7) & 210.14(f)	SFA documents revenue from sale of nonprogram foods accrues to the nonprofit school food service account and is compliant with requirements.		19,019	1	19,019	10.00	190,190	190,190	-	-	-	-
Professional Standards	210.15(b)(8); 210.30(g)	SFA maintains documentation of compliance with professional standards for school nutrition directors, managers and personnel.		19,019	1	19,019	0.25	4,755	4,755	-	-	-	-
Local Wellness Policy	210.15(b)(9) and 210.31(f)	SFA/LEA must retain records to document compliance with the local school wellness policy requirements in 210.30(f).		19,019	1	19,019	0.25	4,755	4,755	-	0	0	0
*		<b>School Food Authority Level Total</b>		19,019	21	399,399	4.33	1,731,018	1,730,919	0	0	99	99
<b>School Level</b>													

	210.10(m)	School maintains written statements signed by a licensed physician of the need for substitutions and recommending alternate foods.		29,058	1	29,058	0.08	2,426	2,325	-	-	101	101
Competitive Foods	210.11(b)(2)	Organizations responsible for food service in schools maintain records.		96,860	1	96,860	0.50	48,430	48,430	-	-	-	-
	210.15(b)(1)	School maintains documentation of participation data by school to support the Claim for Reimbursement.		96,860	180	17,434,800	0.15	2,615,220	2,615,220	-	-	-	-
	210.15(b)(2)(3) & 210.10(a)(3)	Schools maintain production and menu records.		96,860	180	17,434,800	0.25	4,358,700	4,358,700	-	-	-	-
	210.15(b)(5) & 210.13(b&c)	School maintains food safety records and records from most recent food safety inspection.		96,860	120	11,623,200	0.02	232,464	232,464	-	-	-	-
*		<b>School Level Total</b>		96,860	481.30	46,618,718	0.16	7,257,240	7,257,139	-	-	101	101
		<b>Total Recordkeeping Burden</b>		115,935	406	47,100,736	0.19	9,112,749	9,112,541	0	0	208	208

**Public Notification**

				A	B	C = (A*B)	D	E= (C*D)	F				G =E-F
Program Rule	CFR Citation	Title	Form Number	Est. # Respondents	Responses per Respondents	Total Annual Records	Est. Avg. # of Hours Per Response	Estimated Total Hours	Current OMB Approved Burden Hrs	Existing Requirements in Use without OMB approval	Due to Program Change - Final Rule	Due to an Adjustment	Total Difference
Admin Review	210.18(m)(1)	SA must post a summary of the most recent administrative review results of SFAs on the SA website and make a copy available upon request.		56	113	6,328	0.25	1,582	1,582	0	0	0	0
		<b>State Agency Level Total</b>		56	113.00	6328	0.25	1582	1582	0	0	0	0
Local Wellness Policy	210.31(d)(2)	LEA must inform the public annually about the content and implementation of the local school wellness policy and any updates.		19,019	1	19,019	1.00	19,019	19,019	0	0	0	0
Local Wellness Policy	210.31(d)(3), e(2), e(3)	LEA must conduct triennial assessments of schools' compliance with the local school wellness policy and inform public about		6,340	1	6,340	5.00	31,700	31,700	0	0	0	0

		progress.											
		<b>Local Educational Agency / School Food Authority Level Total</b>		19,019	1.33	25,359	2.00	50,719	50,719	0	0	0	0
				0	0.00	0	0.00	0	0	0	0	0	0
		<b>School Level Total</b>		-	-	-		-	-	-	-	-	0
		<b>Total Public Notification Burden</b>		<b>19,075</b>	<b>1.66</b>	<b>31,687</b>	<b>1.65</b>	<b>52,301</b>	<b>52,301</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational Employment and Wage Statistics, Occupational Group (25-0000) ([https://www.bls.gov/oes/current/oes\\_nat.htm#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 LEA staff are estimated at \$30.41 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 (\$30.41 X 9,808,701 hours), which results in an initial cost of \$298,282,597.41. An additional \$98,433,257.15 (33% of \$298,282,597.41) is then added to account for fully-loaded wages, which results in a total cost to the public of \$396,715,854.56.

**A13. Estimates of other total annual cost burden.**

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

There is no capital/start-up or ongoing operation/maintenance costs for this collection of information.

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

**Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

It is estimated that Federal employees receiving an average General Schedule (GS) grade 12 step 6 wage (\$52.66 hourly) based on the 2023 Washington, D.C./Northern Virginia locality area take approximately 1,260 hours to analyze data received from State agencies, for an



initial cost of \$66,351.60 ( $\$52.66 \times 1,260$  hours). To account for fully-loaded wages, an additional \$21,896.03 (33% of \$66,351.60) is then added to the initial costs, resulting in an estimated annualized cost to the Federal Government of \$88,247.63. Additionally, it is estimated that a Branch Chief receiving an average GS grade 14 step 6 wage (\$74.00 hourly) based on the 2023 Washington, D.C./Northern Virginia locality area takes approximately 516 hours to provide oversight for Federal employees working to analyze data received from State agencies, for an initial cost of \$38,184 ( $\$74.00 \times 516$  hours). To account for fully loaded wages, an additional \$12,600.72 (33% of \$38,184) is then added to the initial cost, resulting in an estimated annualized cost to the Federal Government of \$50,784.72. The total estimated annualized cost to the Federal Government is \$139,032.35.

**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-I.**

This is a revision of a currently approved collection. The information collection is currently approved with 9,808,454 total annual burden hours and 47,631,996 total annual responses. Since the last renewal, FNS has adjusted the decimal conversions for the time estimates for some of the information requirements to keep the conversions consistent across its collections. This has resulted in a slight increase of 247 hours to the estimated burden for this collection, from 9,808,454 to 9,808,701 hours, due to an adjustment. FNS estimates that the estimated number of respondents and responses will remain unchanged from the previous renewal. Refer to Attachments A and B for the specific burden hours. With this renewal, FNS estimates that this collection will have 9,808,701 burden hours and 47,631,996 responses.

**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 all 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.