

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

Recordkeeping													
Child Nutrition Program	CFR Citation	Regulation	Form Number	A	B	C = (A*B)	D	E = (C*D)	F	Due to Authorizing Statute	Due to Program Change - Proposed Rule	Due to an Adjustment	G = E-F
				Estimated # Record-keepers	Records Per Recordkeeper	Total Annual Records	Estimated Avg. # of Hours Per Record	Estimated Total Hours	Current OMB Approved Burden Hrs				Total Difference
<b>State Agency Level</b>													
Breakfast	§220.12(a)	SAs must establish rules on competitive foods		56	1	56	1.00	56.000	56				0.00
Breakfast	§220.13(b)(1)	SA maintains Program records as necessary to support the reimbursement payments and reports. Records are provided to FNS when support for reimbursement payments is required.		56	36	2,016	0.08	167	167				0.00
Breakfast	§220.13(c)	SA maintains evidence of complaint investigations and actions.		56	1	56	2.00	112.00	112				0.00
Breakfast	§220.14(d)	SA maintains all records pertaining to claims against SFAs.		56	12	672	0.25	168.00	168				0.00
Breakfast	§220.9(d)	SA determination of severe need.		0	1	0	0.50	0.00	0				0.00
<b>State Agency Level Total</b>				56	50.00	2,800	0.18	503	503	0	0	0	0
<b>SFA Level</b>													
Breakfast	§220.7(e)(13) and §220.11(b)	SFA maintains Program records to support claims.		17,117	10	171,170	0.083	14,207.11	14,207				0.00
Breakfast: Buy American	220.16(d)(5)	SFA maintains documentation demonstrating compliance with the Buy American provision (non-domestic food purchases do not exceed the specified annual threshold).		17,117	10	171,170	0.250	42,792.50	0		42,793		42,792.50
Breakfast: Buy American	220.16(d)(3)	SFAs include language requiring Buy American in all procurement procedures, solicitations, and contracts and maintain such documentation.		17,117	1	17,117	10.000	171,170.00	0		171,170		171,170.00
Breakfast: Menu Planning Option in NSLP/SBP	220.8(c)(3)	SFAs maintain records to demonstrate that schools are tribally operated, are operated by the Bureau of Indian Education, or serve primarily American Indian or Alaska Native students and that they are eligible to elect to implement the operational flexibility to serve vegetables in place of grains in school meals.		285	1	285	1.000	285.00	0		285		285.00
Breakfast: Nutrition Requirements	220.8(a)(3)	SFAs develop menu records (beyond regular menu maintenance) that meet updated and new FNS nutrition specifications from the rule		17,117	10	171,170	0.500	85,585.00	0		85,585		85,585.00
<b>School Food Authority Level Total</b>				17,117	31.02	530,912	0.59	314,040	14,207	0	299,832	0	299,832.00
<b>Site Level</b>													
Breakfast	§220.11(b)	Schools record breakfasts by category at point of service.		88,527	180	15,934,860	0.10	1,593,486.00	1,593,486.00				0
Breakfast	§220.8(a)(3) & 220.9(a)	Schools record menu, food production, and recent nutrition analysis.		88,527	180	15,934,860	0.12	1,912,183.20	1,912,183.20				0
<b>School Level Total</b>				88,527	360	31,869,720	0.11	3,505,669	3,505,669	0	0	0	0
<b>Total Recordkeeping Burden</b>				105,700	306.56	32,403,432	0.12	3,820,212	3,520,380	0	299,832	0	299,832.00

Child Nutrition Program	Estimated # Record-keepers	Records Per Recordkeeper	Total Annual Records	Estimated Avg. # of Hours Per Record	Estimated Total Hours	Current OMB Approved Burden Hrs	Due to Authorizing Statute	Due to Program Change - Proposed Rule	Due to an Adjustment	Total Difference
<b>SBP Record Keeping Info</b>	105,700	307	32,403,432	0.118	3,820,212	3,520,380	0	0	0	299,832

OMB Control #0584-0005  
**Food and Nutrition 7 CFR Part 215 - Special Milk Program (SMP)**

## Reporting

Prgm Rule	CFR Citation	Title	Form Number	A	B	C = (A*B)	D	E= (C*D)	F	G =E-F			
				Estimated # Respondents	Responses per Respondents	Total Annual Records	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Current OMB Approved Burden Hrs	Due to Authorizing Statute	Due to Program Change -	Due to an Adjustment	Total Difference
<b>State Agency Level</b>													
Breakfast	§220.5	SA submits requests for funds to pay SBP claims.		56	36	2,016	0.25	504.00	504				0
Breakfast	§220.15(b)	SA provides records for MEs and audits. Records may be provided to FNS or OIG.		19	1	19	3.00	57.00	57				0
Breakfast	§220.19	SA termination for failure to comply.		0	1	0	2.00	0.00	0				0
<b>State Agency Level Total</b>				56	36.34	2,035	0.28	561	561	0	0	0	0
<b>School Food Authority Level</b>													
Breakfast	§220.7(a)	SFA must submit an application to the State or FNSRO where applicable to operate the SBP in a new school.		168	1	168	0.25	42.00	42				0
Breakfast	§220.11(a)	SFAs submit monthly claims to SA, or FNSRO where applicable.		17,117	10	171,170	1.00	171,170.00	171,170.00				0
Breakfast	§220.11(b)	SFAs requesting a claim exception		117	1	117	0.75	87.75	87.75				0
Breakfast	§220.15(c)	SFAs will provide records for audits.		86	1	86	2.00	172.00	172.00				0
<b>School Food Authority Level Total</b>				17,117	10.02	171,541	1.00	171,472	171,472	0	0	0	0
<b>School Level</b>													
Breakfast	§220.11(b)	Schools submit breakfast counts by category to SFA.		88,527	10	885,270	0.05	44,263.50	44,264				0
<b>School Level Total</b>				88,527	10	885,270	0	44,263.50	44,264	0	0	0	0
<b>Total Reporting Burden</b>				105,700	10.02	1,058,846	0.20	216,296	216,296	0	0	0	0.00

Child Nutrition Program	Estimated # Respondents	Responses per Respondents	Total Annual Records	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Current OMB Approved Burden Hrs	Due to Authorizing Statute	Due to Program Change -	Due to an Adjustment	Total Difference
-------------------------	-------------------------	---------------------------	----------------------	--	-----------------------	---------------------------------	----------------------------	-------------------------	----------------------	------------------

SUMMARY OF BURDEN RECORDKEEPING & REPORTING

TOTAL NO. RESPONDENTS

AVERAGE NO. RESPONSES PER RESPONDENT

TOTAL ANNUAL RESPONSES

AVERAGE HOURS PER RESPONSE

TOTAL BURDEN HOURS WITH REVISION

CURRENT OMB INVENTORY

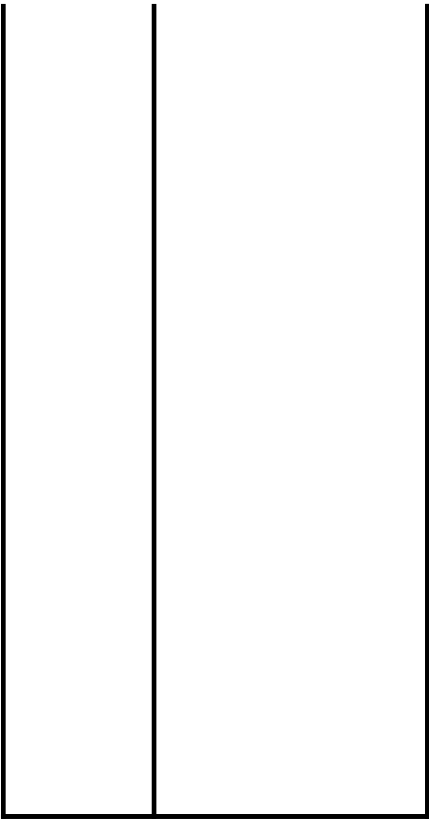
DIFFERENCE IN BURDEN HOURS (NEW BURDEN REQUESTED WITH REVISION)

NG	
	105,700
	316.5778
	33,462,278
	0.120628619127484
	4,036,508
	3,736,676
	299,832.00

**OMB Control #0584-0012 - Burden Summary - 7 CFR Part 220, School Breakfast Program Regulations**

	Estimated # Respondents	Responses Per Respondent	Total Annual Responses (Col. BxC)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. DxE)
<b>Recordkeeping</b>					
State Agency Level	56	50.00	2,800	0.18	503
Institution Level	17,117	31.02	530,912	0.59	314,040
Site Level	88,527	360	31,869,720	0.11	3,505,669
Recordkeeping Total	105,700	306.56	32,403,432	0.12	3,820,212
<b>Reporting</b>					
State Agency Level	56	36.34	2,035	0.28	561
SFA Level	17,117	10.02	171,541	1.00	171,472
School Level	88,527	10.00	885,270	0.05	44,264
Reporting Total	105,700	10.02	1,058,846	0.20	216,296
<b>TOTAL BURDEN FOR REVISION</b>	<b>105,700</b>	<b>316.5778</b>	<b>33,462,278</b>	<b>0.1206</b>	<b>4,036,508</b>

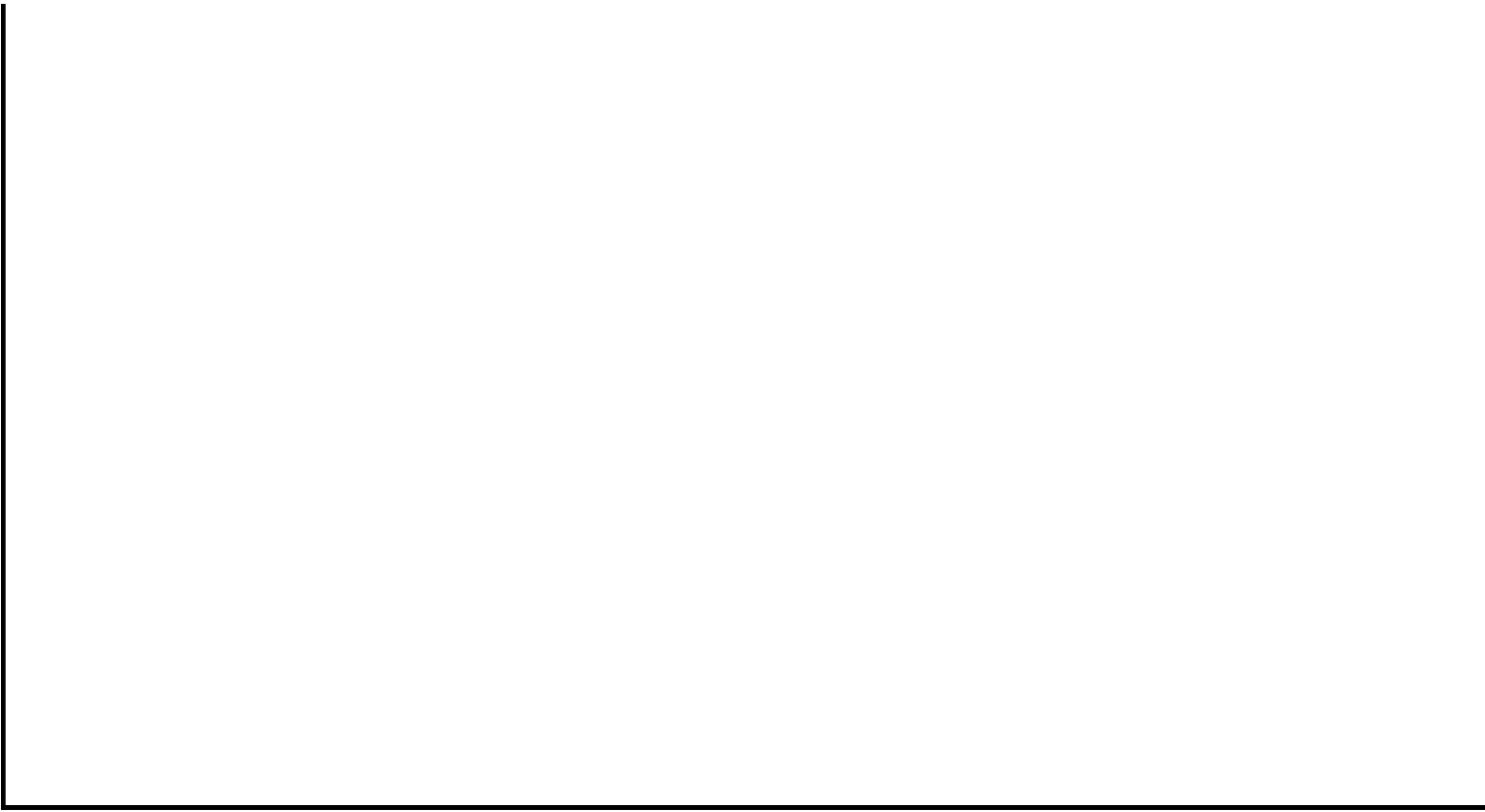
Date	User Initials
	SW
	SW
	JW



**Comments**

This is a DRAFT of the School Breakfast Program Burden doc using the redesigned template  
Burden reduction for renewal. Need to eliminate reporting burden associated with the FNS-10 and FNS-777 to not duplicate  
In response to note in row 3- We removed the FNS-10 and FNS-777 from this collection in an update during CY 2022. Those f





:R.