



Food and Nutrition Service
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FROM: Jamia Franklin
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Food and Nutrition Service (FNS)

DATE: March 18, 2023

SUBJECT: Justification for Non-Material/Non-Substantive Change to OMB Control #0584-0512 regarding National School Lunch Program Equipment Assistance Grants for School Food Authorities

The Food and Nutrition Service (FNS) is requesting a non-substantive change to the Uniform Grant Application for Non-Entitlement Discretionary Grants, approved under OMB Control No. 0584-0512; expiration date of 7/31/2025.

Through this memorandum, we are requesting approval to include the National School Lunch Program Equipment Assistance Grants for School Food Authorities in this OMB-approved information collection request (ICR) for cooperative agreement and grants. The Food and Nutrition Service already has more than sufficient burden hours included in the ICR to cover the work of the sub-grantees as explained in detail below. FNS set aside burden hours for miscellaneous grants in 0584-0512.

The National School Lunch Equipment Assistance Grants for School Food Authorities provides grant funding to Child Nutrition State agencies and directs them to award to local educational agencies and schools to purchase equipment, with a value of greater than \$1,000, needed to serve healthier meals, improve food safety, and to help support the establishment, maintenance, or expansion of the School Breakfast Program.

The burden hours associated with the request for applications from grantees and the submittal of proposals, are delineated below and already covered under the “miscellaneous” grants portion of the ICR for grants not identified in the existing ICR:

- a. There are burden hours associated with the State agency recipients for submission of the application to the Regional Office and receiving responses from State agencies. The estimate is 2 hours for each of the fifty-five State agencies, for a total of 110 hours and 55 responses. These 110 hours would be taken from the existing non-competitive pre-award burden hours of approximately 4,823 and 55 responses would be taken from the 125 responses already set aside for miscellaneous grants not explicitly identified in 0584-0512;

- b. There are burden hours associated with State agency post-award reporting. The estimate is 28 hours total for each of fifty-five State agencies to submit 9 total post award report responses, for a total of 1540 reporting hours and 495 responses. These 1540 hours would be taken from the total post-award of 1540 hours set aside for miscellaneous non-competitive grants not explicitly identified in 0512.
- c. There are burden hours associated with recordkeeping. The estimate is 0.2 hours per each of the fifty-five State agency respondents, for a total of 12 hours and 495 responses (55 State agencies x 9 responses each). These 12 hours would be taken from the existing 12 burden hours and 495 responses would be taken from the 495 responses already set aside for miscellaneous grants not explicitly identified in 0584-0512.

Respondent Type	Burden Estimates	Approved under SA Miscellaneous	Currently Available SA Miscellaneous	Requested for use with this IC for SA Miscellaneous	Difference (Remaining) SA Miscellaneous
State, Local and Tribal Government	Responses	2115	2115	1045	1070
	Hours	7177	7177	1662	5515

Out of an abundance of caution, FNS is submitting this non-substantive change request based, in part, on the language excerpted below from 5 CFR 1320.3 regarding the work of sub-grantees:

Conduct or Sponsor. A Federal agency is considered to conduct or sponsor a collection of information if the agency collects the information, causes another agency to collect the information, contracts or enters into a cooperative agreement with a person to collect the information, or requires a person to provide information to another person, or in similar ways causes another agency, contractor, partner in a cooperative agreement, or person to obtain, solicit, or require the disclosure to third parties or the public of information by or for an agency.

A collection of information undertaken by a recipient of a Federal grant is considered to be “conducted or sponsored” by an agency only if:

- (1) *The recipient of a grant is conducting the collection of information at the specific request of the agency; or*
- (2) *The terms and conditions of the grant require specific approval by the agency of the collection of information or collection procedures.*

The aforementioned language constitutes another reason that FNS is submitting this non-substantive change request to ensure that the sub-grantee applications are encompassed under 0584-0512.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning and Regulatory Affairs Office at (703) 305-2403.

