Attachment B

Estimate of the Information Collection Burden (Narrative) for OMB Control Number 0584-NEW associated with Final Rule: Child Nutrition Programs: Community Eligibility Provision – Increasing Options for Schools RIN 0584-AE93

This document explains the calculation of the information collection burden for the new information collection associated with the Community Eligibility Provision – Increasing Options for Schools final rule. This new collection contains currently approved collections approved under OMB Control Number 0584-0026, *7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. 7 CFR Part 245.9(f)(6) requires SAs to notify LEAs of their community eligibility status by April 15.

   USDA estimates that 55 SAs will submit 93.29 responses annually for an estimated total of 5,131 responses (55 x 93.29 = 5,131). The estimated average burden per response is 3 minutes (0.0501 hours) for a total estimated burden of 257 hours (5,131 x 0.05). **This is adding 257 hours and 5,131 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will add 257 hours and 5,131 responses to the currently approved burden due to an increase in the number of schools eligible to participate in the Community Eligibility Provision (CEP).**

AFFECTED PUBLIC: LOCAL EDUCATIONAL AGENCIES (LEA)/SCHOOL FOOD AUTHORITIES (SFAs)

1. 7 CFR Part 245.9(f)(4)(i) requires LEAs submit to SA documentation demonstrating that the LEA or school meets the identified student percentage by June 30.

   FNS estimates that 471 LEAs will submit 1 response annually for a total of 471 responses (471 x 1 = 471). The estimated average burden per response is 15 minutes (0.25 hours) for a total burden of 118 hours (471 x 0.25 = 84). **This is adding 118 hours and 471 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will add 118 hours and 471 responses to the currently approved burden due to an increase in the number of schools eligible to participate in CEP.**

2. 7 CFR Part 245.6(c)(6)(i) requires LEAs to notify households in writing of approval of meal applications.

   FNS estimates that 14,869 LEAs will submit an average of 219 responses annually for a total of 3,256,311 responses (14,869 x 219 = 3,256,311). The estimated average burden per response is 1 minute (0.02 hours) for a total burden of 54,380 hours (3,256,311 x 0.02 = 54,380). This is adding 54,380 hours and 3,256,311 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 1,910 hours and 114,364 responses from the currently approved burden due to a decrease in the number of LEAs required to determine eligibility using household applications because they are newly operating CEP.

3. 7 CFR Part 245.6(c)(6)(ii) requires LEAs to notify households in writing that children are eligible for free meals based on direct certification and that no application is required.

   FNS estimates that 14,869 LEAs will submit an average of 332 responses annually for a total of 4,936,508 responses (14,869 x 332 = 4,936,508). The estimated average burden

per response is 1 minute (0.02 hours) for a total burden of 82,440 hours (4,936,508 x 0.02 = 82,440). This is adding 82,440 hours and 4,936,508 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 2,660 hours and 159,268 responses from the currently approved burden due to a decrease in the number of LEAs required to notify households that they are directly certified because they are newly operating CEP.

4. 7 CFR Part 245.6(c)(7) requires LEAs to notify households in writing of denied free or reduced-price meal benefits.

FNS estimates that 14,869 LEAs will submit an average of 11.56 responses each year for a total of 171,886 annual responses (14,869 x 11.56 = 171,886). The estimated average burden per response is 1 minute (0.02 hours) for a total burden of 2,870 hours (171,886 x 0.02 = 2,870). This is adding 2,870 hours and 171,886 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 92 hours and 5,518 responses from the currently approved burden due to a decrease in the number of LEAs required to notify households of application denial because they are newly operating CEP.

5. 7 CFR Part 245.6a(f) requires LEAs to notify households of selection for verification.

FNS estimates that 14,869 LEAs will submit 6.50 responses annually for a total of 96,649 responses (14,869 x 6.50 = 96,649). The estimated average burden per response is 15 minutes (0.25 hours) for a total burden of 24,162 hours (96,649 x 0.25 = 24,162). This is adding 24,162 hours and 96,649 responses to OMB's inventory due to a program change. After the changes are merged into OMB #0584-0026, USDA estimates that this will remove 930 hours and 3,720 responses from the currently approved burden due to a decrease in the number of LEAs required to conduct verification because they are newly operating CEP.

6. 7 CFR Part 245.6a(j) requires that LEAs provide households that failed to confirm eligibility with 10 days notice for receiving a reduction or termination of free or reduced-price meal benefits.

   FNS estimates that 14,869 LEAs will provide 2.65 notices annually for a total of 39,403 responses (14,869 x 2.65 = 39,403). The estimated average burden per response is 6 minutes (0.1 hours) for a total burden of 3,948 hours (39,403 x 0.1 = 3,948). This is adding 3,948 hours and 39,403 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 130 hours and 1,304 responses from the currently approved burden due to a decrease in the number of LEAs required to conduct verification because they are newly operating CEP.

7. 7 CFR Part 245.9(f)(5) requires LEAs to submit to the State agency for publication a list of eligible and potentially eligible schools and their eligibility status; unless otherwise exempted by State agency.

   FNS estimates that 5,131 LEAs will submit 1 response annually for a total of 5,131 responses (5,131 x 1 = 5,131). The estimated average burden per response is 5 minutes (0.084 hours) for a total burden of 428 hours (5,131 x 0.08 = 428). This is adding 428 hours and 5,131 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will add 428 hours and 5,131 responses to the currently approved burden due to an increase in the number of schools eligible to participate in the Community Eligibility Provision (CEP).

8. 7 CFR Part 245.9(g) requires LEAs that elect to participate in a Provision to amend their Free and Reduced-Price Policy Statement to include a list of all participating schools and certify the schools meet the criteria.

FNS estimates that 471 LEAs will submit 1 response annually for a total of 471 responses (471 x 1 = 471). The estimated average burden per response is 6 minutes (0.1 hours) for a total burden of 47 hours (471 x 0.1 = 47). This is adding 47 hours and 471 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will add 47 hours and 471 responses to the currently approved burden due to an increase in the number of schools eligible to participate in the Community Eligibility Provision (CEP).

AFFECTED PUBLIC: HOUSEHOLD LEVEL

1. 7 CFR Part 245.6(a)(1) requires households complete application form for free or reduced-price meal benefits.

   FNS estimates that there are 3,439,137 households that will submit 1 record annually for a total of 3,439,137 responses (3,439,137 x 1 = 3,439,137). The estimated average burden per response is 7 minutes (0.117 hours) for a total burden of 402,035 hours (3,439,137 x 0.12 = 402,035). This is adding 402,035 hours and 3,439,137 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 12,735 hours and 108,941 responses from the currently approved burden due to a decrease in the number of households required to submit applications because their school is newly participating in CEP.

2. 7 CFR Part 245.6a(a)(7)(i) requires households to assemble written evidence for verification of eligibility for free and reduced-price meals and send to LEA.

   FNS estimates that 97,287 households will submit 1 response annually for a total of 97,287 responses (97,287 x 1 = 97,287). The estimated average number of burden hours

per response is 30 minutes (0.5 hours) resulting in an estimated total burden of 48,644 hours (97,287 x 0.5 = 48,644). This is adding 48,644 hours and 97,287 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 1,542 hours and 3,082 responses from the currently approved burden due to a decrease in the number of LEAs required to conduct verification because they are newly operating CEP.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES

1. 7 CFR Part 245.9(f)(4)(ii) requires state agencies to review and confirm LEAs eligibility to participate in Provisions 1, 2, or 3 or CEP.

There are 55 State agencies that will maintain an estimated 8.56 records per year for a total of 471 annual responses (55 x 8.56 = 471). The estimated average burden per response is 5 minutes (0.084 hours) for a total burden of 39 hours (471 x 0.084 = 39). This is adding 39 hours and 471 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will add 39 hours and 471 responses to the currently approved burden due to an increase in the number of LEAs applying to operate CEP.

AFFECTED PUBLIC: LOCAL EDUCATIONAL AGENCIES (LEA)/SCHOOL FOOD AUTHORITIES (SFAS)

1. 7 CFR Part 245.6(e) requires LEAs to maintain eligibility determination documentation for 3 years after the end of the fiscal year.

FNS estimates that 14,869 LEAs will maintain 1 set of records each year for a total of 14,869 annual records (14,869 x 1 = 14,869). The estimated average burden per record

is 5 minutes (0.084 hours) for a total burden of 1,242 hours (14,869 x 0.0834 = 1,242). This is adding 1,242 hours and 14,869 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will remove 39 hours and 471 responses from the currently approved burden due to a decrease in the number of LEAs maintaining documentation of eligibility determinations.

2. 7 CFR Parts 245.9(h)(3) requires that LEAs maintain documentation related to methodology used to calculate the identified student percentage and determine eligibility.

FNS estimates that there are 471 LEAs that maintain 1 record annually for a total of 471 records (471 x 1 = 471). The estimated average number of burden hours per record is 55 minutes (0.902 hours), resulting in an estimated total burden of 425 hours (471 x 0.902 = 425). This is adding 429 hours and 471 responses to OMB's inventory due to a program change. After the changes are merged into OMB Control Number 0584-0026, USDA estimates that this will add 425 hours and 471 responses to the currently approved burden due to an increase in the number of LEAs electing CEP.