

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0649:

Summer Food Site Locations for State Agencies

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Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3
A2. PURPOSE AND USE OF THE INFORMATION.....5
A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....6
A4. EFFORTS TO IDENTIFY DUPLICATION.....7
A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....7
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....8
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....9
A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....9
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....12
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....12
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....13
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....13
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....15
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....15
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....16
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....17
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....18
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....18

Attachments:

A: Form FNS-905 Summer Food Site Locations for State Agencies

B: Section 13 and 26, Richard B. Russell National School Lunch Act (42 U.S.C. 1761 et seq. and 42 U.S.C. 1769g et seq.)

C: Public Comments to 60-Day Federal Register Notice

C1: Public Comment #1

C2: Response to Public Comment #1

C3: Public Comment #2

C4: Response to Public Comment #2

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.

Section 13 of the Richard B. Russell National School Lunch Act (NSLA) (Attachment B) authorizes the Summer Food Service Program (SFSP) and the National School Lunch Program Seamless Summer Option (SSO) to provide low-income children with access to nutritious meals when school is not in session. Meals meeting Federal nutrition guidelines are served at no cost to all children 18 years old and under at approved SFSP and SSO sites in areas in which at least 50 percent of children are eligible for free and reduced-price school meals during the school year. SFSP and SSO sites operate, by design, for a short period during the summer and their locations, hours and days of operations may not be well known to those children who depend on school lunch during the school year. The FNS-905 Summer Food Site Locator collects this information and makes it available to the public.

Section 26 of the NSLA (42 U.S.C. 1769g) (Attachment B) also mandates FNS to enter into a contract with a non-governmental organization to develop and maintain a clearinghouse to provide information to non-governmental groups located throughout the United States that assist low-income individuals or communities regarding food assistance, self-help activities to aid individuals in becoming self-reliant, and other activities that empower low-income individuals or communities to improve the lives of low-income individuals and reduce reliance on Federal, State, or local government agencies for food or other assistance. SFSP and SSO sites are a component of this assistance and are included in the clearinghouse.

The Form FNS-905 is specific to summer meal site data and populates the National Hunger Clearinghouse database with summer meals site information and locations. The USDA National Hunger Clearinghouse is a resource for the public to find information about the nutrition safety net. Information collection activities associated with the USDA National Hunger Clearinghouse and its associated FNS-543 form, National Hunger Clearinghouse Database Form, are covered under OMB Control Number 0584-0474 National Hunger Clearinghouse Database Forms (FNS 543), which is approved through April 30, 2025.

The information collected on the FNS-905 form, in addition to the FNS-543, populates the USDA National Hunger Clearinghouse. The National Hunger Clearinghouse collects, develops, and distributes information and resources to help build the capacity of emergency food providers to address the immediate needs of struggling families and individuals while promoting self-reliance and access to healthy food. The information is used by FNS to fight hunger and improve nutrition by increasing participation in FNS nutrition programs through the development, coordination, and evaluation of strategic initiatives, partnerships, and outreach activities. The Clearinghouse also supports the USDA National Hunger Hotline, which refers people in need anywhere in the U.S. to food pantries, soup kitchens, grassroots organizations and, in this case specifically, approved open summer meal sites.

Unlike other resources in the Clearinghouse, State agencies must approve all summer meal sites to be included in the database. (The burden on State agencies to approve summer meal sites is covered under OMB Control Number 0584-0280 7 CFR Part 225, Summer Food Service Program, which is approved through September 30, 2025). Form FNS-905 collects site name,

location, and operating details, such as dates and times of site operation.

Thus, FNS is submitting this information collection request in order to continue collecting information mandated by Congress. Through this ICR renewal, FNS requests a revision of the paperwork burden for 0584-0649. The revised estimates and changes are detailed in section A12 and A15 of this supporting statement, respectively.

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.

During the summer operational period (May – September), the information collected voluntarily from State agencies on the FNS-905 provides a resource for groups that assist low-income children, families, and communities regarding child nutrition when school is out. The Form FNS-905, which may only be completed by State agencies, collects details about each site such as times, days, and dates of operation, location, types of meals served, contact information and if the site is open to the public. Sponsors provide this information to their State agencies during the sponsor and site application process as required by regulation 7 CFR 225.6. The States use this form to voluntarily report site information to FNS. Form FNS-905 is voluntary and State agencies are asked to complete the form at least once per the summer operational period. However, State agencies may submit weekly updates during summer operations. (The burden on Program sponsors to report site information to State agencies is covered under OMB Control Number 0584-0280 7 CFR Part 225, Summer Food Service Program, which is approved through September 30, 2025).

Partners and the general public have used the data collected on the FNS-905 in the creation of mobile applications and texting services, and the data have also been used by State agencies to plan summer site visits, by Program sponsors to strategically plan for future years' summer feeding operations and by researchers in academic institutions. FNS has used these data collected from the FNS-905 to improve integrity and to analyze policy proposals, as well as to report to leadership real-time results that cannot be ascertained through other reporting methods.

Once per week during the operating period, the data collected using the FNS-905 are posted on an open data platform that is accessible to the public at all times, so it is not possible to fully know all the users of these data. Other interested parties may include nutrition or health education professionals, state or local government health officials, nutrition councils, public interest advocates, private foundations, and corporate officials.

This collection only contains reporting burden. For this revision, the frequency of responses per respondent has been updated, which has caused an increase in the responses and burden hours for this collection. The respondent costs of \$1,713 have also been removed from the burden for this collection. Please see A15 for further details concerning these changes.

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.

State agencies approve summer meal sites, according to regulations at 7 CFR 225.6(b). The site information obtained from the approved summer meal site applications are then electronically submitted to FNS voluntarily via the FNS-905 via the FNS and State agency sharing portal known as Partnerweb. FNS made efforts to improve the submission process and reduce burden by allowing States to submit the FNS-905 and make updates via PartnerWeb, rather than by email, as was the previous standard. These data are then uploaded and posted publicly on a weekly basis to an open data page (<https://www.fns.usda.gov/sfsp/developer-tools>) and integrated into public-facing web tools, such as the Summer Site Finder Tool, for families and children to find their nearest meal site: <https://www.fns.usda.gov/meals4kids>. Out of the 583 responses for this collection, FNS estimates that 100% will be collected electronically.

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.

The summer food site location information is not collected through any other means. The State agencies complete the FNS-905 using the site information provided by sponsors in their program applications. The State agencies then voluntarily submit this information to FNS using the FNS-905. The FNS-905 is also the only form that can be used for collecting data about summer sites, as they must be approved by the State agencies before being made public.

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. The State agencies are the only respondents who complete FNS-905. In view of this, none of the estimated 53 respondents for this collection are considered small entities.

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.

This is an ongoing, voluntary data collection and the data collected assists FNS in meeting statutory requirements. The SFSP and SSO are designed to operate when school is out during the summer months. Due to the limited time available for site operations, families and communities may not know where and how to find meals for children who depend on the NSLP during the school year. The site details collected with the FNS-905, 11 times throughout the summer, are used to populate online mapping tools, texting services, and other community-built tools to help connect children with nutritious summer meals. Without the FNS-905, children, families, responders, and communities would have little to no access to this information, and therefore, not collecting these data could impact program participation. These site details also help State agencies and communities plan future efforts and efficiently allocate resources in areas of most need through public facing data analysis and visualization tool services developed by FNS. Without the voluntary collection of this information and the ability of FNS to provide these data through these services, State agencies and communities may not be able to effectively evaluate and plan for the Summer Meals Program.

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;**

During the summer operational period (May – September), FNS makes weekly updates to the Summer site mapping tool. States that would like to participate in the Summer Site Locator are welcome to submit the FNS-905 on a weekly basis (which equals roughly 11 submissions during the summer operational period) in order to have the most up to date information available to the public.

- **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.

The 60-day Federal Register notice titled “Agency Information Collection Activities: Summer Food Site Locations for State Agencies” was published on July 21, 2022 (FR Vol. 87, No. 139, 43492).

The public comment period closed on September 19, 2022. Two comments were received, to which FNS provided a response (Attachments C1 through C4). The majority of comments were in support of the FNS-905 as a necessary collection of information for both the State agencies and the public. Some commenters suggested increasing the frequency of submissions from weekly to daily to avoid site operating details being outdated, while others suggested utilizing an Application Programming Interface to directly sync updates between the State agency and FNS’ data system. FNS agrees that site operating details can quickly become outdated if site details change daily. FNS is looking into ways to modernize the system to streamline the process to allow States to make updates that support their programs. FNS agrees that this would help reduce the burden on State agencies and increase the accuracy of the summer meals site data. Recently, FNS made efforts to improve the submission process by allowing States to submit the FNS-905 and make updates via the FNS and State agency sharing portal, PartnerWeb. FNS takes all comments into consideration, and appreciated the commenters’ suggestions on ways in which the submission process may be improved. FNS will continue to look into these suggestions; however, FNS has not made any modifications to the information collection at this time.

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.

FNS consults with Regional offices regarding any proposed changes as the result of legislative, regulatory, or administrative changes. Regional offices are in daily contact with State agencies, which provide feedback on FNS processes and procedures for this information collection. In addition, FNS National Office staff work with State agencies to complete and submit the FNS-905, and are able to receive feedback on the collection of this information on a continual basis. For this revision, FNS sought input from State agencies that have voluntarily participated in this information collection. Several State agencies provided feedback on the availability of data and the frequency of collection. States did not provide feedback on the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), or on the data elements to be recorded, disclosed, or reported. Consultants included:

- Jennifer Weber, MS, Executive Director of Child Nutrition Programs, Oklahoma State Department of Education, Jennifer.weber@sde.ok.gov
- Shanna Legier, MS, RD, LDN, Education Program Consultant, Nutrition Support, Louisiana Department of Education, shanna.legier@la.gov
- Bryan Van Dorn, MPA, SFSP and Nutrition Coordination Supervisor, Office of Health and Nutrition Services, Michigan Department of Education, vandornb2@michigan.gov
- Marcia Yurczyk, MS, Assistant Director, School and Summer Monitoring Programs,

Indiana Department of Education, myurczyk@doe.in.gov

Overall, the State agencies provided positive feedback and are in support with the collection of this information. They commented on the frequency of collection. FNS learned that some State agencies prefer to submit this information less frequently, while others prefer to submit the information collection on a more frequent basis. Since this is a voluntary collection, States have the ability to submit updates to the summer site finder as often as they like. Some States maintain their own summer site map and finder tool, which refreshes daily, in order to help families in their States identify the nearest summer site during summer months. At this time, FNS has not made any changes to the process, however, we are looking into ways that we can modernize the system to streamline the process to allow States to make updates that meet their needs.

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 payments or gifts will be 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.

The Department complies with the Privacy Act of 1974. No confidential information is associated with this collection of information. The FNS-905 instructions include two optional data fields, which request the State Site identification number and the State Sponsor identification number. These items are not made available to the public. This field is only used to assist in communication

with FNS in identifying, updating, and deleting specific sites and therefore is not shared with the public. This ICR does not request any personally identifiable information, nor does it include a form that requires a Privacy Act Statement. The FNS Privacy Officer reviewed and approved this collection on October 4, 2022.

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.

This information collection does not involve questions of a sensitive nature.

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 a currently approved information collection. With this submission, there are 53 State agency respondents, 583 annual responses, and 73 total annual burden hours. The average number of responses per respondent is 11, and the estimated time of response is approximately 7.5 minutes for each response.

Estimates are based on actual submissions of the FNS-905 by State agencies since the collection

was last approved. These estimates also reflect consultations with affected stakeholders and prior experience in collecting similar information. The results of our analysis are presented in the summary table below.

Burden Summary (Reporting):

Affected Public: State, Local, and Tribal Government (State agencies)

Estimated Number of Respondents: 53 State agencies

Estimated Number of Responses per Respondent: 11 responses per State agency

Estimated Total Annual Responses: 583 responses

Estimated Time per Response: 7 minutes and 30 seconds (0.125 hours)

Estimated Total Annual Burden on Respondents: 72.875 hours.

Current OMB Inventory for 0584-0649: 53 hours

Difference (change in burden with this renewal): 19.875 hours

Respondent	Estimated # Respondents	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dx)	Current OMB inventory	Changes with this renewal
Reporting Burden							
State agencies	53	11	583	0.125	72.875	53	19.875
Total Reporting Burden	53		583		72.875	53	19.875

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

Only State agencies complete the FNS-905 and the estimate of respondent cost is based on the

burden estimates developed in 12(a) above. Based on the Bureau of Labor Statistics May 2021 Occupational Employment and Wage Statistics – 13-2031 (<http://www.bls.gov/oes/current/oes132031.htm>), hourly mean wage for budget analyst functions performed by State agency staff are valued at \$36.75 per staff hour, thus the base annual respondent cost is estimated at \$2,682.75 (73 hours x \$36.75). An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$885.31. This results in a total annual respondent cost of \$3,568.06.

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 are no capital/start-up or ongoing operational/maintenance costs associated with this information collection.

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.

As most of this process is automated, the cost is minimal. The annual hours worked on preparing this data collection and the hours worked to monitor the clearinghouse is approximately 33% of an employee's time. For the purpose of this annualized cost estimate, the employee is assumed to be a GS-12 Step 1 for the Washington D.C. locality area using the Federal GS Pay Scale published in 2022, which has an hourly rate of \$43.04 per hour. Federal

staff spend approximately 13.3 hours per week performing activities related to this information collection. Therefore, the estimated \$572.43 is spent weekly and an estimated \$29,645 is spent annually in staff time from other miscellaneous employees that contribute their time. This is approximately 33% of an employee's annual salary of \$89,834 based on the GS-12 Step 1 pay scale. An additional 33% of the estimated annual cost must be added to represent fully loaded wages, equaling \$9,782.85. Therefore, the total estimated cost to the Federal Government for this information collection is \$39,427.85.

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 submission is a revision of a currently approved information collection request, which is set to expire October 31, 2022. This collection is currently approved with 53 respondents, 424 responses, 53 burden hours, and \$1,713 in costs. This request revises the previous information collection total annual responses as an adjustment due to the increase in the number of responses per respondent. The FNS-905 is voluntary and State agencies are asked to complete the form at least once annually. However, State agencies may submit weekly updates during the summer operations. Since this is a voluntary collection, State agencies can determine if they would like to participate, and how frequently they submit their data. State agencies may submit updates as many times as they would like. FNS reviewed the number of submissions per State agency since the collection was last approved, and the data has shown that the average number of responses per State agency has slightly increased from 8 submissions annually to an average of 11 responses annually. There are no changes for the number of respondents or estimated time per

response. The change in the frequency of responses is expected to increase the responses for this collection from 424 to 583 responses annually, resulting in an increase of approximately 159 responses due to an adjustment. The change in frequency also increases the burden hours for this collection from 53 to 73 hours annually, resulting in an increase of approximately 20 burden hours. This is also due to an adjustment.

The last information collection submission included a respondent cost of \$1,713. There are no capital, start-up, operational or maintenance costs for respondents associated with this information collection. Respondent costs were erroneously entered as these burden costs when the previous collection was originally submitted. Since the respondent cost of \$1,713 was mistakenly entered in the last submission and since these are not capital, start-up, operational, or maintenance costs that FNS reports as part of the approved burden for the collection, we have removed them during this revision.

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 analyses. FNS provides this service during the summer operational period (May – September). Weekly updates on the data are made on a 19-week schedule. Once per week during the operating period, the data collected using the FNS-905 are posted on an open data platform that is accessible to the public at all times.

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 the FNS-905

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.