

Attachment G. Burden Narrative for
OMB Control Number 0584-0005 7 CFR Part 15
Special Milk Program for Children

Estimate of the Information Collection Burden for the
Special Milk Program (OMB Control Number 0584-0005)

This document explains the calculation of the information collection burden for OMB Control Number 0584-0005 Special Milk Program as submitted for the renewal of the information collection. A notice was published in the Federal Register on July 7, 2025, in volume 90, page 29832.

Section 215.2 defines the following:

“*School Food Authority (SFA)*” is the governing body which is responsible for the administration of one or more schools and which has the legal authority to operate a milk program therein. The term “*School Food Authority*” also includes a nonprofit agency to which such governing body has delegated authority for the operation of a milk program in a school.

“*Child care institution*” (CCI) is any nonprofit nursery school, child care center, settlement house, summer camp, service institution participating in the Summer Food Program for Children pursuant to part 225 of this chapter, institution participating in the Child and Adult Care Food Program pursuant to part 226 of this chapter, or similar nonprofit institution devoted to the care and training of children. The term “*child care institution*” also includes a nonprofit agency to which such institution has delegated authority for the operation of a milk program in the institution. It does not include any institution falling within the definition of “*School*” of this section.

“*FNSRO*” means Food and Nutrition Services Regional Offices, of the Food and Nutrition Service of the U.S. Department of Agriculture.

AFFECTED PUBLIC: STATE AGENCIES

REPORTING REQUIREMENTS

1. Section 215.5(a) requires that funds to be paid to any State shall be made available by means of Letters of Credit issued by FNS in favor of the State agency (SA). The SA shall: (1) Obtain funds needed to reimburse School Food Authorities and child-care institutions through presentation by designated State officials of a Payment Voucher on Letter of Credit (Treasury Form GFO 7578) in accordance with procedures prescribed by FNS and approved by the U.S. Treasury Department; (2) submit requests for funds only at such times and in such amounts as will permit prompt payment of claims; and (3) use the funds received from such requests without delay for the purpose for which drawn.

FNS estimates that 43 SAs will each file 24 reports per year for a total of 1,032 responses (43 X 24 = 1,032). The estimated average number of burden hours per

response is 15 minutes (0.25 hours) resulting in estimated total burden hours of 258 ($1,032 \times .25 = 258$) for this collection. The previously reported burden for this activity was 54 respondents, 1,296 responses and 324 burden hours. Due to fewer State agencies participating in the program, FNS estimates that the respondents for this collection will decrease by 11, from 54 to 43 respondents. This in turn will reduce the responses and burden hours for this collection by 264 responses, from 1,296 to 1,032 responses and by 66 hours, from 324 to 258 hours due to an adjustment.

RECORDKEEPING REQUIREMENTS

1. Section 215.7 mandates that SAs maintain applications submitted by, and agreements executed with, SFAs and sponsors. Each SFA or CCI shall make written application to, and enter into a written agreement with, the SA, or FNSRO where applicable, for any school or CCI in which it desires to operate the Program, if such school or CCI did not participate in the Program in the prior fiscal year.

FNS estimates that 43 SAs will each file 34.98 reports annually for a total of 1,504 responses ($43 \times 34.98 = 1,504$). The estimated average number of burden hours per response is 5 minutes (0.0853 hours) resulting in estimated total burden hours of 126 ($1,504 \times 0.0853 = 125.58$).

The previously reported burden for this activity was 54 respondents, 3,445 responses, and 344.52 hours; Due to fewer State agencies and fewer SFAs participating in the program, FNS estimates that the number of respondents has decreased by 11 from 54 to 43. The estimated hours per response was adjusted from .10 hours (6 minutes) to .0835 hours (5 minutes) to align with similar program requirements. Altogether, there is a reduction of 1941 responses, from 3445 to 1504 and by 218 burden hours, from 344 to 126 due to an adjustment.

2. Section 215.11(b) requires SAs to maintain documentation of compliance reviews, site visits, and program assistance of schools participating in the Program for compliance with the provisions of this part when such schools are being reviewed under the provisions identified under §210.18(i) of this title and to maintain documentation.

FNS estimates that 43 SAs will each file 5 reports per year for a total of 215 responses ($43 \times 5 = 215$). The estimated average number of burden hours per response is 10 minutes (.167 hours) resulting in estimated total burden hours of 36 ($215 \times .167 = 35.91$).

The previously reported burden for this activity was 54 respondents, 270 responses, and 54 hours. Due to fewer State agencies participating in the program, FNS estimates that the number of respondents has decreased by 11 from 54 to 43. The estimated hours per response was adjusted from .2 hours (12 minutes) to .25 hours (10 minutes) to align with similar program requirements. Altogether, there is a reduction

of 55 responses from 270 to 215, and by approximately 18 burden hours from 54 to 36 due to an adjustment.

3. Section 215.11(c)(1) requires each SA to maintain Program records as necessary to support the reimbursement payments made to CCIs or SFAs under §215.8 and §215.10 and the reports submitted to FNS under §215.11(c)(2).

FNS estimates that 43 SAs will each maintain approximately 790 records per year for a total of 33,970 responses ($43 \times 790 = 33,970$). The estimated average number of burden hours per response is 5 minutes (0.0835 hours) resulting in estimated total burden hours of 2,837 ($33,970 \times 0.0835 = 2836.5$).

The previously reported burden for this activity was 54 respondents, 42,660 responses, and 4,266 burden hours. Due to fewer State agencies participating in the program, FNS estimates that the respondents for this collection will decrease by 11, from 54 to 43 respondents. The estimated hours per response was adjusted from .10 hours (6 minutes) to .0853 hours (5 minutes) to align with similar program requirements. This in turn will reduce the responses and burden hours for this collection by 8,690 responses, from 42,660 to 33,970 and by 1,429.51 hours, from 4,266 to 2,837 hours due to an adjustment.

4. Under 7 CFR 215.12 each State agency maintains all records of action taken on disallowed claims. Section 215.12 states that SAs shall disallow any portion of a claim and recover any payment made to a SFA or CCI that was not properly payable.

FNS estimates that 43 SAs will each file 2 reports per year for total of 86 responses ($43 \times 2 = 86$). The estimated average number of burden hours per response is 20 minutes (0.334 hours) resulting in estimated total burden hours of 29 ($86 \times .334 = 28.72$).

The previously reported burden for this activity was 54 respondents, 108 responses, and 36 burden hours. Due to fewer State agencies participating in the program, FNS estimates that the respondents for this collection decreased by 11, from 54 to 43 respondents. This results in a reduction of 22 responses from 108 to 86, and a reduction of approximately 7 burden hours from 36 to 29 hours. In addition, FNS adjusted the decimal used for the time estimate from .33 hours (19.8 minutes) to .334 hours (20 minutes) to align it with similar program requirements.

5. Under 7 CFR 215.13(a), each State agency shall maintain A-133 audit, audit plan, and management evaluations including records of the receipt and expenditure of funds under the program. Section 215.13(a) requires that audits at the State and SFA/CCI levels shall be conducted in accordance with Office of Management and Budget Circular A-133 and the Department's implementing regulations at 7 CFR Part 3052.

FNS estimates that 43 SAs will each file 1 report annually for total of 43 responses ($43 \times 1 = 43$). The estimated average number of burden hours per response is 15

minutes (0.25 hours) resulting in estimated total burden hours of 10.75 ($43 \times 0.25 = 10.75$). The estimated hours per response was adjusted from .26 hours (15.6 minutes) to .25 hours (15 minutes) to align with similar program requirements. Altogether, there is a reduction for this activity of 3.29 hours from 14.04 to 10.75 burden hours for this collection due to an adjustment resulting from fewer State agencies participating in the SMP.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITY (SFA) (LOCAL SITES)

REPORTING REQUIREMENTS

1. Section 215.7(c) mandates application requirements for participation in the Special Milk Program. Each SFA submits an application to the SA to operate the SMP and enters into a written agreement with the SA or FNSRO.

FNS estimates that 1,183 SFAs will each file 1 report annually for a total of 1,183 responses ($1,183 \times 1 = 1,183$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in estimated total burden hours of 296 ($1,183 \times .25 = 295.75$). The previously reported burden for this activity was 3,155 respondents, 3,155 responses, and 789 burden hours. Due to fewer SFAs participating in the program, FNS estimates that the respondents for this collection will decrease by 1,972 respondents, from 3,155 to 1,183 respondents. This in turn will reduce the responses and burden hours for this collection by 1,972 responses, from 3,155 to 1,183, and by 493 hours, from 789 to 296 due to an adjustment.

RECORDKEEPING REQUIREMENTS

1. Under 7 CFR 215.7 each SFA is required to maintain written agreements with the SA or FNSRO, including claims for reimbursement. Section 215.7 requires each SFA approved to participate in the program to enter into a written agreement with the SA or FNSRO. It also requires that, in submitting a Claim for Reimbursement, each SFA certify that the claim is true and correct; that records are available to support the claim; that the claim is in accordance with the existing agreement; and that payment therefore has not been received.

FNS estimates that there are 1,183 SFAs that will each file 10 reports per year for a total of 11,830 responses ($1,183 \times 10 = 11,830$). The estimated average number of burden hours per response is 5 minutes (0.0833 hours) resulting in estimated total burden hours of 988 ($11,830 \times 0.0833 = 987.805$).

The previously reported burden for this activity was 3,155 respondents, 31,550 responses and 6,130 burden hours. Due to fewer SFAs participating in the program, FNS estimates that the respondents for this collection decreased by 1,972 from 3,155 to 1,183. This in turn results in a reduction of 19,720 responses from 31,550 to 11,830.

The estimated hours per response was adjusted from .2 hours (12 minutes) to .0853 hours (5 minutes) to align with similar activities across the program. Altogether, there is a reduction of approximately 5,322 hours from 6,310 to 987, in addition to the reduction of 19,720 responses, due to an adjustment.

2. Section 215.14(a) SFAs must maintain records demonstrating compliance with regulations concerning the procurement of all goods and services with nonprofit school food service account funds.

FNS estimates that there are 1,151 SFAs that will each file 1 report annually for a total of 1,151 responses ($1151 \times 1 = 1151$). The estimated average number of burden hours per response is 10 minutes (0.167 hours) resulting in estimated total burden hours of 192 ($1151 \times 0.167 = 192.22$).

The previously reported burden for this activity was 2,679 respondents, 2,679 responses, and 536 burden hours. Due to fewer SFAs participating in the program, FNS estimates that the respondents for this collection decreased by 1,528 from 2,679 to 1,151. This results in a reduction of responses by the same amount from 2,679 to 1,151. The estimated hours per response was adjusted from .2 hours (12 minutes) to .167 hours (10 minutes) to align with similar activities across the program. Altogether, Therefore, there is a reduction of approximately 344 hours from 536 to 192, in addition to the reduction of 1,528, due to adjustments.

AFFECTED PUBLIC: NON-PROFIT CHILD CARE INSTITUTIONS (LOCAL SITES)

REPORTING REQUIREMENTS

1. Section 215.7(c) mandates application requirements for participation in the Special Milk Program. Each CCI submits an application to the SA to operate the SMP and enter into a written agreement with the SA or FNSRO.

FNS estimates that 321 CCIs will each file 1 report annually for a total of 321 responses ($321 \times 1 = 321$). The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in estimated total burden hours of 80 ($321 \times .25 = 80.25$). The previously reported burden for this activity was 290 respondents, 290 responses, and 72 burden hours. Due to an increase in CCIs participating in the program, FNS estimates that the respondents for this collection will increase by 31 respondents, from 290 to 321. This in turn will increase the responses and burden hours for this collection by 31 responses, from 290 to 321, and by 8 hours, from 72 to 80 due to an adjustment.

RECORDKEEPING REQUIREMENTS

1. Under 7 CFR 215.7 each CCI must maintain a written agreement with the SA or FNSRO including claim for reimbursements. Section 215.7 requires each CCI approved to participate in the program to enter into a written agreement with the SA or FNSRO. Such agreement shall provide that the CCI shall retain Program records and make them available. It also requires that, in submitting a Claim for Reimbursement, each CCI certify that the claim is true and correct; that records are available to support the claim; that the claim is in accordance with the existing agreement; and that payment therefore has not been received.

FNS estimates that there are 321 CCIs that will each file 10 reports per year for a total of 3,210 responses ($321 \times 10 = 3,210$). The estimated average number of burden hours per response is 5 minutes (0.0835 hours) resulting in estimated total burden hours of 268.04 ($3,210 \times 0.0835 = 268.04$).

The previously reported burden for this activity was 290 respondents, 2,900 responses and 580 burden hours. Due to an increase in CCIs participating in the program, FNS estimates that the respondents for this collection increased by 31 from 290 to 321. This results in an increase of 310 responses from 2,900 to 3,210 responses. However, the estimated hours per response was adjusted from .2 hours (12 minutes) to .0835 hours (5 minutes) to align with time estimates to complete similar recordkeeping activities across the program. Altogether, there is a reduction of approximately 312 hours from 580 to 268 hours due to adjustments.