

Attachment F SAE Burden Narrative

Estimate of the Information Collection Burden for State Agency Administrative Expense Funds – 7 CFR Part 235 (OMB #0584-0067)

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Sections 235.5(b)&(c) require each SA to submit to FNS for approval an initial State Administrative Expense (SAE) plan and any amendments. FNS estimates that 83 SAs and alternate SAs will each file 0.361 reports annually for a total of 30 responses. The estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 240 ($30 \times 8 = 240$). There is no change in burden.
2. Section 235.5(d) requires each SA to annually submit to FNS a State Administrative Expense Funds Reallocation Report (FNS-525) on the use of SAE funds. FNS estimates that 83 SAs and alternate SAs will each file 1 report annually for a total of 83 responses. The estimated average number of burden hours per response is 2 hours for 23 SAs receiving reallocated funds and 15 minutes (0.25 hours) for 60 SAs not requesting reallocated funds resulting in an estimated total annual burden hours of 306 ($(23 \times 2 = 46) + (60 \times 0.25 = 15) = 61$). **FNS revised the FNS-525 form to eliminate data fields which collected data that could be obtained by FNS via the FNS financial systems. This resulted in the elimination of every field on the previous form, except for the grantee name, current fiscal year, and the amount of funds requested. New sections were added for the Justification for Funds Request and for Regional Office Recommendations, in addition to attestations. These changes resulted in a reduction of the estimated time to complete the FNS-525 form from 12 hours and 30 minutes to 2 hours and 15 minutes. This reduces 245 hours of reporting burden, from 306 to 61 hours per year, due to a program change.**
3. Section 235.7(b) requires each SA to submit an annual report containing information on School Food Authorities under agreement with the State agency to participate in the National School Lunch or Commodity School programs. FNS estimates that 56 SAs will each file 1 report annually for a total of 56 responses. The estimated average number of burden hours per response is 1 hour resulting in an estimated total annual burden hours of 56 ($56 \times 1 = 56$). There is no change in burden.

Activities removed since prior approval / or with this submission:

None.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

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1. Section 235.7(a) requires each SA to keep records on the expenditure of State administrative expense (SAE) funds and maintain current accounting records which shall adequately identify fund authorizations, obligations, unobligated balances, assets, liabilities, outlays and income. FNS estimates that 83 SAs and alternate SAs will each file 26 reports annually on *allocated* SAE funds for a total of 2,158 responses. FNS estimates that 23 SAs will each file 26 reports annually on *reallocated* SAE funds for a total of 598 responses. FNS estimates that 67 SAs and alternate SAs will each file 1 report annually on *carryover* SAE funds for a total of 67 responses. The total number of responses is 2,823. The estimated average number of burden hours per response is 2 hours resulting in an estimated total annual burden hours of 5,646 hours ($2,823 \times 2 = 5,646$). There is no change in burden.
2. Section 235.9(c)(d) require the SA to comply with 2 CFR part 200 regarding procurement procedures and utilization and disposition of property acquired with SAE funds. FNS estimates that there are 83 SAs that will file 1 record annually for a total of 83 records. The estimated average number of burden hours per record is 3 hours resulting in an estimated total annual burden hours of 249 hours ($83 \times 3 = 249$). There is no change in burden.
3. Section 235.11(a) requires SAs to identify and document expenditure of funds from State revenues to meet the State funding requirement. FNS estimates that there are 54 SAs that will each file 4 records annually for a total of 216 records. The estimated average number of burden hours per record is 15 minutes (0.25 hours) resulting in an estimated total annual burden hours of 54 hours ($216 \times 0.25 = 54$). There is no change in burden.

Changes made for FY2022 renewal:

The previously approved burden was 6,551 hours and 3,291 responses. This revision requests a burden of 6,306 hours and 3,291 responses resulting in a net decrease of 245 total burden hours (245 reporting hours and no change in recordkeeping hours or responses). The decrease in the hours is due to form revisions.