

Estimate of the Information Collection Burden for the
Determining Eligibility for Free and Reduced Price Meals (OMB #0584-0026)

This document explains the calculation of the information collection burden for the information collection titled Determining Eligibility for Free and Reduced Price Meals, OMB #0584-0026, as submitted for the revision of the existing regulations and associated forms. A notice was published in the Federal Register on June 8, 2012, in Vol. 77, No. 111, p. 34005-34010.

Comments have been received in response to the Agency's notice and FNS' response to these comments is included in the supporting statement. Please note that 2010 revision had several errors in citations, text, number of responses and response time. In addition to program changes, several program adjustments were made in this revision. All changes are in bold and explained clearly.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: HOUSEHOLD LEVEL

1. 7 CFR Part 245.6(a) requires households complete application form for meal benefits. FNS estimates that there are 8,262,043 households that will submit 1 record annually for a total of 8,262,043 responses. The estimated average burden per response is 0.07 hours for a total burden of 578,343 hours (8,262,043 X 0.07 = 578,343). The current approved burden is 657,300 for a program change of -78,957 due to the decrease in number of households from 9,390,000 to 8,262,043.

2. 7 CFR Part 245.6a(a)(7)(i) requires households assemble written evidence and send to SFA.

FNS estimates that there are 190,000 households that will each report 1 record annually for a total of 190,000 responses. The estimated average number of burden hours per response is 0.5 resulting in estimated total burden hours of 95,000 (190,000 X 0.5 = 95,000). The

current approved burden is 129,000 for a program change of -34,000 due to the decrease in number of households from 258,000 to 190,000.

3. 7 CFR Part 245.6a(a)(7)(ii) requires households cooperate with collateral contacts for verification of eligibility.

FNS estimates that there are 1,900 households that will each report 1 record annually for a total of 1,900 responses. The estimated average burden per response is 0.167 hours for a total burden of 317 hours ($1,900 \times 0.167 = 317$). The current approved burden is 430 for a program change of -113 due to the decrease in number of households from 2,580 to 1900.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITIES (SFA)

1. 7 CFR Part 245.6(c)(6)(i) requires SFAs notify households in writing of approval of meal applications.

There are 20,858 SFAs that will each submit 300 average responses annually for a total of 6,257,400 responses. The estimated average burden per response is 0.02 hours for a total burden of 125,148 hours. In 2010 revision this citation was not included by error. A total of 125,148 burden hours were added as a program adjustment for this citation.

2. 7 CFR Part 245.6(c)(6)(ii) requires SFA notify households in writing that children are eligible for free meals based on direct certification and that no application is required.

There are 20,858 SFAs that will each submit 150 average responses annually for a total of 3,128,700 responses. The estimated average burden per response is 0.02 hours for a total burden of 62,574 hours. The current approved burden is 1,731 for a program adjustment of 60,843 due to the increase in frequency of response (1 to 150) and decrease in response time (.08 to .02).

3. 7 CFR Part 245.6(c)(7) requires SFAs notify households in writing of denied benefits.

There are 20,858 SFAs that will each submit 17 average responses annually for a total of 354,586 responses. The estimated average burden per response is 0.02 hours for a total burden of 7,092 hours. The current approved burden is 192,922 for a program adjustment of 185,830 . Note that this citation was included in school section with 2010 renewal by error. This revision fixed that error as this task applies to SFAs not schools per regulation.

4. 7 CFR Part 245.6(j) requires SFAs must enter into written agreement with the agency receiving children's free and reduced price eligibility information.

There are 20,858 SFAs that will each submit 1 response annually for a total of 20,858 responses. The estimated average burden per response is .166 hours for a total burden hours of 3,462 hours. FNS estimates 3,462 annual burden hours for this provision (20,858 SFAs x 1 response annually = 20,858 total annual response x .166 minutes) which the burden remains unchanged of 3,462. However, there was an error with the frequency. Therefore, we decrease the annual responses from 2 to 1 and reduced the response time from .083 to 0.166.

5. 7 CFR Part 245.6a(c) requires SFAs determine the sample size of households to verify eligibility.

There are 20,858 SFAs that will each submit 1 response annually for a total of 20,858 responses. The estimated average burden per response is 0.33 hours for a total burden of 6,883 hours.

6. 7 CFR Part 245.6a(f) requires SFAs notify households of selection for verification.

There are 20,858 SFAs that will each submit 12 responses annually for a total of 250,296 responses (20,858 X 12= 250,296). The estimated average burden per response is 0.25 hours for a total burden of 62,574 hours (250,296 x 0.25 = 62,574). **Note correction in citation from 245.6a(f)(1) to 24536a(f).**

NOTE: 8,300,000 applications are approved and about 3% are verified ($8,300,000 \times 0.03 = 250,500$). These are divided by 20,858 SFAs ($250,500/20,858 = 12$). An average of 12 households per SFA will be notified of their selection for verification.

7. 7 CFR Part 245.6a(h) requires SFAs report verification information to State agency.

There are 20,858 SFAs that will each submit 1 report annually using the FNS-742 form for a total of 20,858 responses. The estimated average burden per response is 0.75 hours for a total burden of 15,644 hours ($20,858 \times 0.75 = 15,644$). This is not a new citation for this revision. Current approved burden narrative (2010 revision) reported this citation under 245.6(a)(c). This error is corrected in this renewal. As a result of revisions to FNS-742 response time increased from 0.5 hours 0.75 hours and that resulted in a program adjustment of 5,215 hours.

8. 7 CFR Part 245.9(f) requires SFAs with schools under Provisions 1, 2, or 3 must identify those schools in its free and reduced policy statement and certify their eligibility for the first year of operation.

FNS estimates there are 1,092 SFAs that have Provision 1, 2, or 3 schools and each will submit 1 report annually for a total of 1,092 responses. The estimated average burden per response is 0.25 hours for a total burden of 273 hours ($1,092 \times .25 = 273$). Note change in citation from 245.9 (c) to 245.9(f). This is a correction of error.

9. 7 CFR Part 245.9(h) requires SFAs with schools under Provisions 2 or 3 submit to FNS upon request all data and documentation used in granting extensions.

FNS estimates that there are 1,092 SFAs that have Provision 2 or Provision 3 schools and each will submit 1 report annually for a total of 1,092 responses. The estimated average burden per response is 0.083 hours for a total burden of 273 hours ($1,092 \times .25 = 273$).

10. 7 CFR Part 245.10(a) requires SFAs submit to State agency for approval free and reduced price policy statement.

There are 20,858 SFAs that will each submit 1 report annually for a total of 20,858 responses. The estimated average burden per response is estimated to be 0.7535 hours for a total burden of 1,572 hours ($20,858 \times 0.7535 = 1,572$). The current approved burden is 1,731 for a program adjustment of 160 due to the decrease in time per response from .083 hours to .075.

AFFECTED PUBLIC: STATE AGENCIES (SA)

1. 7 CFR Part 245.4(c) requires Puerto Rico and Virgin Islands State agencies conduct triennial survey to develop factor for withdrawal of funds from Letter of Credit.

Two SAs will each submit 0.33 reports annually for a total of 0.66 responses. The estimated average burden per response is 70 hours for a total estimated burden of 46 hours. The current approved burden is 166 for a program adjustment of -120 due to the decrease in time per response from 83 hours to 70 hours.

2. 7 CFR Part 245.4(d) requires Puerto Rico and Virgin Islands State agencies (SAs) submit triennial survey results and the factor for funds withdrawal to FNS for approval.

Two SAs submit 0.33 reports annually for a total of 0.66 responses. The estimated average burden per response is 5 hours for a total estimated burden of 3 burden hours. The current approved burden is 2 hours for a program change of 1 due to the increase in time per response from 3 hours to 5 hours.

3. 7 CFR Part 245.6(i) requires State agencies that use or disclose information other than specified by regulation must obtain prior written consent from parent or guardian.

There are 56 SAs that will each submit 1 report annually for a total of 56 responses. The estimated average burden per response is 0.25 hours for a total estimated burden of 14 hours.

4. 7 CFR Part 245.6(j) requires State agencies enter into written agreement with the party receiving children's free and reduced price meal eligibility information.

There are 56 SAs that will each submit 1 response annually for a total of 56 responses. The estimated average burden per response is 0.25 hours for a total estimated burden of 14 hours.

5. **7 CFR Parts 245.11(a)(1) and 245.3(a) require State agencies issue a prototype free and reduced price policy statement and annually announce the family-size and income standards.**

There are 56 SAs that will each submit 1 response annually for a total of 56 responses. The estimated average burden per response is 0.1 hours for a total estimated burden of 5.6 hours. The current approved burden is 4.6 hours for a program adjustment of 1 due to the increase in time per response from 0.08 to .10 hours.

6. 7 CFR Part 245.11(g) requires State agencies notify FNS if TANF is comparable to or more restrictive than AFDC.

There are 56 SAs that will each submit 1 response annually for a total of 56 responses. The estimated average burden per response is 0.1 hours for a total estimated burden of 5.6 hours. The current approved burden is 4.6 hours for a program adjustment of 1 due to the increase in time per response from 0.08 to .10 hours.

7. **7 CFR Part 245.11(h)(4) requires State agencies submit to FNS upon request, the number of schools on Provision 1, Provision 2 or Provision 3 and extensions.**

FNS estimates that 43 SAs have Provision 1, Provision 2 or Provision 3 schools and SFAs. Each of those SAs will submit 1 response upon request for a total of 43 responses annually. The estimated average burden per response is 1.5 hours for a total burden of 64.5 hours. The current approved burden is 172 hours for a program adjustment of 108 due to the decrease in time per response from 4 hours to 1.5 hour.

- 8. 7 CFR Part 245.11(i) requires State agencies collect, analyze, and submit to FNS annual verification data. Form FNS-742 will be used to report this data.**

There are 56 SAs that will each submit 1 report for a total of 56 responses annually. The estimated average burden per response is 4 hours for a total burden hours of 224 hours. This line item was not included in 2010 renewal by error. Hence this citation carries a program adjustment of 224 hours.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES

- 1. 7 CFR Part 245.6(b)(1)(iv) requires State agencies maintain agreements with the State agency conducting eligibility determinations for SNAP.**

There are 54 State agencies that will maintain 1 record for a total of 54 responses. The estimated average burden per response is 0.1 hours for a total burden of 5 hours. Current approved burden is 0 hours and this citation adds 5 hours as a result of program change related to direct certification.

- 2. 7 CFR Part 245.11(h) requires State agencies maintain information on schools participating and extensions granted in Provision 2 and 3.**

FNS estimates that 43 SAs have Provision 1, Provision 2 or Provision 3 schools and SFAs. Each State agency will retain 155 consolidated records (6,674 schools divided by 43 State agencies = 155 schools/State agency) for a total of 6,665 responses (43 X 155 = 6,665). The estimated average burden per response is 0.25 hours for a total burden of 1666 hours.

- 3. 7 CFR Part 245.11(i) requires State agencies maintain records on annual verification data.**

There are 56 SAs that will each maintain 1 report and the associated data collected for a total of 56 responses. The estimated average burden per response is 0.2 hours for a total burden hours of 11 hours.

AFFECTED PUBLIC: SCHOOL FOOD AUTHORITYIS (SFA)

- 1. 7 CFR Parts 245.6(e) requires that SFAs maintain eligibility determination documentation for 3 years after the end of the fiscal year.**

FNS estimates there are 20,858 SFAs that maintain 1 set of records annually for a total of 20,858 responses. The estimated average burden per response is 0.08 hours for a total burden of 1,669 hours. Current approved burden is 0 for this citation. This was omitted by error in 2010 revision.

- 2. 7 CFR Parts 245.9(g) and (h) require that SFAs maintain records related to implementation of Provisions 1, 2, and 3 for 3 years after submission of the last Claim for Reimbursement.**

FNS estimates that there are 1092 SFAs that maintain 1 record annually for a total of 1092 responses. The estimated average number of burden hours per response is 2.4715 resulting in estimated total burden hours of 2,699 hours. The current approved burden is 4,368 hours for a program adjustment of 1669 due to the decrease in time per response from 4 hours to 2.4 hour