

Attachment E 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 that will each file 1 report annually for a total of 83 responses. The estimated average number of burden hours per response is 12 hours for 23 SAs receiving reallocated funds and 30 minutes (0.5 hours) for 60 SAs not receiving reallocated funds resulting in an estimated total annual burden hours of 306 ($(23 \times 12 = 276) + (60 \times 0.5 = 30) = 306$). There is no change in burden.
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:

Section 235.3(b) requires each SA administering CN Programs to enter into a written agreement with FNS (FNS-74). FNS estimates that 75 SAs and alternate SAs filed 1 response for a total of 75 responses. The estimated average number of burden hours per response is 15 minutes (0.25 hours) resulting in an estimated total burden hours of 19 ($75 \times 0.25 = 19$). This burden is being removed because it was incorrectly included ... it is a permanent agreement which is not collected or updated annually. Therefore, 19 hours of reporting burden is being removed from this information collection as a program change.

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

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 x 2 = 5,646).

In addition, the Federal-State agreement (FNS-74) listed under Section 235.7(a) is being removed from this collection because it is a permanent agreement which is not collected or updated annually. The estimated burden hours per response was 0.083 resulting in a total annual burden hours of 6 (75 x 0.083 =6).

The requirement is currently approved with 5,704 hours (5,698 hours for the records under Section 235.7(a) and 6 hours for FNS-74). As a result of one fewer State agency maintaining this record and the removal of FNS-74, FNS estimates that the burden is being reduced by 58 hours (52 hours for the records due to an adjustment and 6 hours for FNS-74 due to a program change), to 5,646 hours.

2. Sections 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 x 3 = 249). **This requirement is currently approved with 252 hours. As a result of one fewer State agency maintaining this record, FNS estimates that the burden is being reduced by 3 hours, to 249 hours due to an adjustment.**
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 x 0.25 = 54). There is no change in burden.

Changes made for FY19 renewal:

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The previously approved burden was 6,631 hours and 3,469 responses. This revision requests a burden of 6,551 hours and 3,291 responses resulting in a net decrease of 80 total burden hours (61 recordkeeping hours and 19 reporting hours) and 178 fewer responses. The decrease in the hours and responses are due to both program changes and adjustments. FNS estimates that 25 hours and 150 responses will be removed from the collection due to a program change and that 55 hours and 28 responses will be removed due to an adjustment.