

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0067:**

**7 CFR PART 235 - STATE ADMINISTRATIVE EXPENSE (SAE) FUNDS**

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**Attachments**

- A. Child Nutrition Act: Section 7 [42 U.S.C. 1776] – State Administrative Expenses Authorization
- B. State Administrative Expense Funds Regulations 7 CFR Part 235
- C. FNS-525 State Administrative Expense Funds Reallocation Report
- D. Public Comment
- E. SAE Burden Chart
- F. SAE Burden Narrative

**A1. Circumstances that make the collection of information necessary.**

**Explain the circumstances that make this 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.**

This is a reinstatement, with change, of a previously approved collection for which approval has expired. The authority for this collection is provided in Section 7 of the Child Nutrition Act of 1966, 80 Stat. 888, 889, as amended (42 U.S.C. 1776). The title of Section 7 is STATE ADMINISTRATIVE EXPENSES (Refer to Attachment A). As required, the Food and Nutrition Service (FNS) issued regulations in 7 CFR Part 235 (Attachment B), which prescribes the methods for making payments of funds to State agencies to use for administrative expenses incurred in overseeing and providing technical assistance in connection with activities undertaken under the National School Lunch Program (NSLP), the Special Milk Program (SMP), the School Breakfast Program (SBP), the Child and Adult Care Food Program (CACFP), and the Food Distribution Program (FDP). This information collection is required to administer these Programs in accordance with the Act.

**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.**

The purpose of this collection is stated in the PART 235—STATE ADMINISTRATIVE EXPENSE FUNDS regulations (7 CFR 235.1) which implements “the methods for making payments of funds to State agencies for use for administrative expenses incurred in supervising and giving technical assistance in connection with activities undertaken by them under the National School Lunch Program, the Special Milk Program, the School Breakfast Program, the Child and Adult Care Food Program, and the Food Distribution Program.” FNS

uses this information solely to determine the amount of SAE funding that each agency receives.

The collection of this information is mandatory since the Federal regulations in 7 CFR Part 235 SAE Funds require the collection of information associated with this collection. This applies to all of the information requirements in the collection.

The respondents for reporting information and for maintaining the records consist of the State educational agencies and alternate State Agencies that have agreements with FNS for the administration of the NSLP, SBP, SMP, CACFP, FDP or some combination thereof. Some States have more than one State agency administering these Programs; therefore, the number of respondents (83) is greater than the combined number of States and the District of Columbia, Guam, Puerto Rico, and Virgin Islands.

This information collection covers reporting (an SAE Plan and information on School Food Authorities (SFAs) participating in the NSLP) and recordkeeping requirements (accounting records and expenditure records of SAE funds). These requirements are described in detail below. Please refer to Attachment F SAE Burden Narrative for additional information concerning these requirements.

No information in this collection will be shared outside USDA.

### **SAE Plan**

7 CFR 235.5(b)(1) states that “Each State agency shall submit, subject to FNS approval, an initial State Administrative Expense plan based upon guidance provided by FNS.” 7 CFR

235.5(c) states that “A State agency may amend its plan at any time to reflect changes in funding or activities, except that, if such changes are substantive, the State agency shall amend its plan in accordance with guidance provided by FNS.” 7 CFR 235.5(b)(5) states that “State agencies shall implement their approved plans (as amended). FNS collects any updates to the plan and shall monitor State agency implementation through management evaluations, State agency reports submitted under this part, audits, and through other available means.” On average, State agencies submit SAE Plans as necessary according to guidance and regulations, whenever there is a substantive change to the base plan.

### **Information Reported on SFAs Participating in the NSLP or Commodity School Programs (CSP)**

7 CFR 235.7(b) states that “Each State agency shall also submit an annual report containing the number of School Food Authorities (SFAs) under agreement with the State agency that participate in the National School Lunch or Commodity School Programs.” This data is necessary to perform the formula allocation of SAE funds. The number of SFAs that meet the definition of “large” SFA is also collected. There is no form associated with reporting this information to FNS. Instead, the information submitted to FNS for the previous SAE formula allocation is updated as needed by the State Agencies.

### **SAE Funds Reallocation Report (FNS-525)**

7 CFR 235.5(d) states that “Annually, between March 1 and May 1 on a date specified by FNS, of each year, each State agency shall submit to FNS a State Administrative Expense Funds Reallocation Report (FNS-525) on the use of SAE funds.” This report will be used to reallocate SAE funds. Refer to Attachment C for the form.

## **Recordkeeping Requirements**

7 CFR 235.7(a) states that “Each State agency shall keep records on the expenditure of State administrative expense funds. Such records shall conform with the applicable State plan for use of State administrative expense funds. The State agency shall make such records available, upon a reasonable request, to FNS, or the U.S. Comptroller General and shall maintain current accounting records of State administrative expense funds which shall adequately identify fund authorizations, obligations, unobligated balances, assets, liabilities, outlays and income. The records may be kept in their original form or on microfilm, and shall be retained for a period of three years after the date of the submission of the final Financial Status Report, subject to the exceptions noted.” “Records for nonexpendable property acquired with State Administrative Expense Funds shall be retained for three years after its final disposition.” This is an annual requirement.

Subsection 7(f) of the Child Nutrition Act requires FNS to pay SAE funds “only to States that agree to maintain a level of funding out of State revenues, for administrative costs in connection with programs under this Act and the National School Lunch Act, not less than the amount expended or obligated in Fiscal Year 1977.” This is an annual requirement. 7 CFR 235.11(a) states that “State agencies shall follow the provisions specified in identifying and documenting expenditures of funds from State revenues to meet the State funding requirement.”

After review, FNS has determined that the removal of the recordkeeping requirement for the FNS-777, which was announced in the 60-Day Notice and which FNS thought could be removed now that FNS-525 collected the same information, is still needed to meet the requirements of 235.7(a) and will therefore be retained with this collection. Additionally, the

portion of the recordkeeping requirement for 235.7(a) that was attributed to the FNS-525 no longer needs to be submitted 26 times per year and thus the frequency of reporting has been reduced to annually. Finally, FNS has obtained updated information which reduces the number of reporting respondents for the 235.7(b) requirement from 56 to 55 as Arkansas has consolidated its two NSLP agencies into a single NSLP agency.

This change results in a reduction of 2,076 responses and 4,151 burden hours and provides a new overall burden of 1,215 responses and 2,155 burden hours for this collection.

### **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.**

FNS is committed to complying with the E-Government Act, 2002 to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. State agencies maintain records electronically. There is a small amount of non-electronic submissions that are sent via email or flash drive or facsimile, such as the submission of amendments to a SAE plan and the FNS-525 form. Out of the 1,215 responses for this collection, FNS estimates that 964 of the 1,047 recordkeeping responses (92%) will be maintained electronically and none of the 168 reporting responses (0%) will be submitted electronically (for a total of 79% filed electronically).

#### **Burden Reduction Efforts**

FNS has made every effort to reduce burden and simplify the request for information while ensuring the continued utility of collected information. FNS estimates a reduction of

approximately 4,151 burden hours (from 6,306 to 1,965 hours) due to changing processes.

Further details outlining this reduction can be found in responses A2 and A15.

#### **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.**

There is no similar information collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements and state administrative agency requirements. FNS solely administers and monitors SAE funds.

#### **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. State agencies are not considered small entities as state populations exceed the 50,000 threshold for a small government jurisdiction; therefore, they do not meet the definition of “small entity” in the Regulatory Flexibility Act. None of the respondents are 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 a reinstatement, with change, of a previously approved collection for which approval has expired. This collection expired on January 31, 2026 but under usual circumstances it is considered to be an ongoing mandatory information collection that is required under the statute. Since the information is required under statute, FNS has continued collecting it in violation of the PRA. The information is collected for the purpose of administering an ongoing program. Information is

collected annually, quarterly, bi-weekly, or as necessary, as SAE funds are appropriated and made available to SAs on a fiscal year basis. The FNS-525 is collected annually, as are accounting records of expenditures, procurement and property management standards procedures, and SFA participation rates. SAE Plans are submitted semi-annually, when substantive changes occur to the base plan. Information on the Maintenance of Effort, collected via the FNS-777, is collected quarterly. Additional information on expenditures is collected bi-weekly. If the information is not collected or is collected less frequently, FNS would not be able to properly fund State agencies to administer these Programs and would not be able to monitor funding.

#### **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;**
- **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 special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

## **Collection of Race/Ethnicity Data**

Race and ethnicity data is not collected.

### **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.**

A 60-day notice was published in the Federal Register on September 11, 2025 (Vol. 90, No. 174, pp. 44001-44002). The comment period ended on November 10, 2025. One comment was received in response to the agency's notice (Attachment E.1). The comment speaks to the administrative changes to burden in this collection as well as risks associated with the streamlined FNS-525, with key concerns and suggestions that apply to State Administrative Expense funds for the Supplemental Nutrition Assistance Program (SNAP). The commentor specifically addressed the design of the FNS-525, with concerns that it did not collect information related to "the existence, employment status, or activity of individuals listed under administrative expenses." The FNS-525 does not collect administrative expense data, rather the form asks whether State agencies are requesting SAE Reallocation funds and a general description of the activity for which those funds are to be used. The commentor also discussed the removal of the FNS-777 reporting burden associated with this collection – suggesting that "eliminating a cross-check mechanism without replacing its oversight function weakens federal visibility into state-level fund use." The FNS-777 has not been used for

oversight purposes in this collection and the information contained in the FNS-777 will still be reported. The comment referenced Child Nutrition Programs and then shifted to SNAP, and due to this, its overall intention was unclear. Because FNS could not determine the commenter's position or recommendations as they pertain to Child Nutrition Programs, the comment was disregarded.

**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.**

Stakeholders such as State agencies that have been consulted are 1.) Vonda Ramp ([vramp@pa.gov](mailto:vramp@pa.gov)), Director of Child Nutrition Programs, Pennsylvania Department of Education; 2.) Carla Bankes ([carla.bankes@wyo.gov](mailto:carla.bankes@wyo.gov)), State Director of Wyoming Child Nutrition Programs, Wyoming Department of Education; and 3.) Robert Leshin ([RLeshin@doe.mass.edu](mailto:RLeshin@doe.mass.edu)), Director of Child Nutrition Programs, Massachusetts Department of Education. FNS did not receive any feedback from these stakeholders.

**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 payment or gift was 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. This information collection was submitted to Deea Coleman, FNS Privacy Officer who made the determination on May 14, 2025, that no confidential information is associated with this information collection. This collection does not request any personally identifiable information, nor does it contain any forms that require a Privacy Act Statement.

**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.**

There are no questions of a sensitive nature included in this information collection.

**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 reinstatement, with change, of a previously approved collection for which approval has expired. For this reinstatement, this information collection will have 83 respondents, 1,215 responses, and 2,155 burden hours. The respondents for this collection consist of 83 State agencies (comprised of 51 State educational agencies in 47 States, the District of Columbia, Guam, Puerto Rico, and Virgin Islands; 18 alternate State agencies in California, Colorado, Florida (2), Georgia, Illinois, Missouri, Montana, Nevada, New Jersey, New Mexico, New

York, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia; and 14 State distributing agencies in Colorado, Delaware, Kentucky, Louisiana, Nebraska, New Hampshire, New Mexico, New York, North Carolina, Pennsylvania, Rhode Island, Tennessee, Virginia, and West Virginia) that have executed agreements with FNS for the administration of the NSLP, SBP, SMP, CACFP, FDP, or some combination thereof.

The following tables and Attachment E SAE Burden Chart reflect the estimated burden associated with this information collection for each type of respondent for both reporting and recordkeeping:

**ESTIMATED ANNUAL BURDEN FOR OMB Control Number 0584-0067, STATE AGENCY EXPENSE FUNDS – 7 CFR PART 235 – RESTATEMENT OF A PREVIOUSLY APPROVED COLLECTION**

<b>REPORTING</b>									
<b>Regulation Citation</b>	<b>Description of Activities</b>	<b>Form Number</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Burden Hours</b>	<b>Previously Approved Estimated Total Burden Hours</b>	<b>Changes Due to Program Change</b>
235.5(b)&(c)	SA submits base SAE Plan and Amendments.		83	0.361	30	8	240	0	240
235.5(d)	SA submits SAE Funds Reallocation Report annually.	FNS-525	23	1	23	2	46	0	46
			60	1	60	0.25	15	0	15
235.7(b)	SA submits information reported on SFAs participating in NSLP or CSP.		55	1	55	1	55	0	55
	<b>Reporting Total</b>		<b>83</b>	<b>2.024</b>	<b>168</b>	<b>2.118</b>	<b>356</b>	<b>0</b>	<b>356</b>

<b>RECORDKEEPING</b>									
<b>Regulation Citation</b>	<b>Description of Activities</b>	<b>Form Number</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Burden Hours</b>	<b>Previously Approved Estimated Total Burden Hours</b>	<b>Change Due to Program Change</b>
235.7(a)	SA maintains current accounting records of expenditure of SAE funds which adequately identify fund authorizations, obligations, unobligated balances, assets, liabilities, outlay, and income. (Includes funds	FNS-525 & FNS-777	83	1	83	2	166	0	166
			23	26	598	2	1,196	0	1,196
			67	1	67	2	134	0	134

	carried over into								
235.9(c)&(d)	SA procurement and property management standards procedures comply with 2 CFR part 200.		83	1	83	3	249	0	249
235.11(a)	SA documents expenditures of funds from State sources in any fiscal year for the administration of CNP is not less than that expended or obligated for that fiscal year.	FNS-777	54	4	216	0.25	54	0	54
<b>Recordkeeping Total</b>			<b>83</b>	<b>12.61</b>	<b>1,047</b>	<b>1.718</b>	<b>1,799</b>	<b>0</b>	<b>1,799</b>

**ESTIMATED ANNUAL BURDEN FOR OMB Control Number 0584-0067, STATE AGENCY EXPENSE FUNDS – 7 CFR PART 235 – REVISION OF A CURRENTLY APPROVED COLLECTION**

REPORTING									
Regulation Citation	Description of Activities	Form Number	Estimated # of Respondents	Frequency of Response	Total Annual Responses	Average Burden Hours per Response	Estimated Total Burden Hours	Previously Approved Estimated Total Burden Hours	Changes Due to Adjustment
235.5(b)&(c)	SA submits base SAE Plan and Amendments.		83	0.361	30	8	240	240	0
235.5(d)	SA submits SAE Funds Reallocation Report annually.	FNS-525	23	1	23	2	46	46	0
			60	1	60	0.25	15	15	0
235.7(b)	SA submits information reported on SFAs participating in NSLP or CSP.		55	1	55	1	55	56	-1

	<b>Reporting Total</b>		<b>83</b>	2.024	<b>168</b>	2.118	<b>356</b>	<b>357</b>	<b>-1</b>
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<b>RECORDKEEPING</b>									
<b>Regulation Citation</b>	<b>Description of Activities</b>	<b>Form Number</b>	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Burden Hours</b>	<b>Previously Approved Estimated Total Burden Hours</b>	<b>Change Due to Adjustment</b>
235.7(a)	SA maintains current accounting records of expenditure of SAE funds which adequately identify fund authorizations, obligations, unobligated balances, assets, liabilities, outlay, and income. (Includes funds carried over into subsequent FY.)	FNS-525 & FNS-777	83	1	83	2	166	4,316	-4,150
			23	26	598	2	1,196	1,196	0
			67	1	67	2	134	134	0
235.9(c)&(d)	SA procurement and property management standards procedures comply with 2 CFR part 200.		83	1	83	3	249	249	0
235.11(a)	SA documents expenditures of funds from State sources in any fiscal year for the administration of CNP is not less than that expended or obligated for that fiscal year.	FNS-777	54	4	216	0.25	54	54	0
	<b>Recordkeeping Total</b>		<b>83</b>	12.61	<b>1,047</b>	1.718	<b>1,799</b>	<b>5,949</b>	<b>-4,150</b>

	<b>Estimated # of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours per Response</b>	<b>Estimated Total Burden Hours</b>
<b>Reporting Total</b>	<b>83</b>	<b>2.024</b>	<b>168</b>	<b>2.118</b>	<b>356</b>
<b>Recordkeeping Total</b>	<b>83</b>	<b>12.614</b>	<b>1,047</b>	<b>1.718</b>	<b>1,799</b>
<b>Total Burden</b>	<b>83</b>	<b>14.638</b>	<b>1,215</b>	<b>1.773</b>	<b>2,155</b>

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

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2024 National Occupational and Wage Statistics, Occupational Group (25-0000) (<http://www.bls.gov/oes/current/oes250000.htm>). The hourly mean wage (for education-related occupations) for functions performed by State agency staff is estimated at \$29.88 per staff hour. The estimated base annual cost to the public is \$64,391 (2,155 hours X \$29.88 per hour). To account for fully loaded wages, an additional 33% of the estimated base cost must be added (\$64,391x .33) or \$21,249. Therefore, the total cost to the public is \$85,640.

**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 annual operation/maintenance costs for this collection of information.

**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.**

It is estimated that federal employees receiving an average General Schedule (GS) grade 12 step 6 wage based on the 2026 Washington DC-Northern Virginia locality area hourly wage rates take approximately 200 hours to analyze data received from State agencies. The estimated base

annualized cost is \$11,450 ( $\$57.25 \times 200 \text{ hours} = \$11,450$ ). To account for a fully-loaded wage rate, an additional 33% of the base annualized cost must be added ( $\$11,450 \times .33$ ), which equals \$3,779. Therefore, the estimated annualized cost to the Federal government is \$15,229.

**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 is a reinstatement, with change, of a previously approved collection for which approval has expired. The approval for this collection expired on January 31, 2026. With this reinstatement, this collection will have 1,215 responses and 2,155 burden hours as a program change due to a potential violation of the PRA.

Although the approval for this collection ultimately expired before the revision package was submitted to OMB for review, FNS was working on the package and fully intended to submit it before the approval expired. Before the expiration, this collection was approved with 3,291 responses and 6,306 burden hours. While working on the revisions, FNS determined that there were two updates to the collection that would need to be made which would impact the responses and burden hours for the collection.

The first of these changes was that the number of respondents for the reporting requirement at 235.7(b) would need to be adjusted due to a decrease in the number of respondents from 56 to 55, which in turn reduced the responses and burden hours for this requirement by 1. This change was due to an adjustment. The second change was for the recordkeeping requirement at 235.7(a) for the FNS-525 form. The frequency of the recordkeeping responses was adjusted from 26 to 1 to correct an error in the previously approved frequency. This adjusted the previously approved

responses and burden hours for this requirement from 2,158 responses and 4,316 hours to 83 responses and 166 hours, respectively. The adjustment in the frequency reduced the responses by 2,075 and the hours by 4,150 due to an adjustment. Overall, before the expiration of this collection, the burden for this collection would have shown a reduction of 2,076 responses and 4,151 burden hours all due to an administrative adjustments. FNS estimated that the burden for this collection would be 1,215 responses and 2,155 burden hours as a result of these administrative adjustments.

The estimates now being reported in this collection differ from those reported in the 60-Day Notice. FNS is now retaining the recordkeeping burden associated with the FNS-777 that was originally planned to be removed from this collection. This change is no longer being made as the FNS-777 form is integral to the recordkeeping requirements of 235.7(a) and 235.11(a). FNS also determined that an update to the number of respondents for 235.7(b) was necessary. Therefore, we adjusted the number of State agencies for the 235.7(b) reporting requirement because the two NSLP agencies in Arkansas were combined into one agency. Likewise, the frequency of recordkeeping associated with the FNS-525 in 235.7(a) was erroneously captured in previously approved collections, so it was adjusted from 26 to one.

When the 60-Day Notice was published, FNS expected to have 3,075 responses and 6,252 burden hours as the new burden estimates for this collection. However, as a result of the identified changes, the estimated burden for this collection will be much lower than the projected estimates. The new estimate of projected responses will be reduced by 1,860 responses to 1,215 and the burden hours will be reduced by 4,097 hours to 2,155.

**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.**

There are no plans to tabulate or publish any information in connection with this information collection.

**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 all instruments.

**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.