

Action: Request for Extension of Currently Approved Information Collection

Title: Performance Reporting System – Management Evaluation

OMB No 0584-0010

A. Justification

1. Explain the circumstances that make the collection of information necessary

This statement supports the request for an extension of a currently approved information collection associated with Food Stamp Program (FSP) Performance Reporting System (PRS). Section 11 of the Food Stamp Act (the Act) of 1977, as amended, requires that State agencies maintain records necessary to ascertain that the FSP is operating in compliance with the Act and regulations and must make these records available to the Food and Nutrition Service (FNS) for inspection.

Management Evaluation (ME) Review Schedules – Unless the State receives approval for an alternative ME review schedule, each State agency is required, under 7 CFR part 275, to submit one review schedule every one, two, or three years, depending on the project area make-up of the State.

2. Indicate how, by whom, and for what purpose the information is to be used

The purpose of the PRS is to ensure that each State agency and project area is operating the FSP in accordance with the Act, the regulations, and the State agency's Plan of Operation. The System enables each State agency to monitor its administration of the FSP. It is also a tool used by FNS to evaluate State agency operations and to collect information that is necessary to develop solutions to improve the State's administration of FSP policy and procedures.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or the technological techniques.

FNS is committed to complying with the E-Government Act 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. For the PRS, State agencies have the authority to use information technology that best suits the needs of their individual or unique systems of operations to comply with this information collection. While not mandated, States use automated systems to compile and analyze program administration review information that can be accessed by FNS.

4. Describe efforts to identify duplication.

There are currently no known State agency monitoring systems in place which are designed to obtain data similar to that required for the PRS.

5. Impact of the collection on small business.

This information collection does not affect small business or other small entities. The collection is limited to what is necessary to comply with statutory requirements and to protect FSP integrity.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The purpose of this information collection is to support the Federal management evaluation review of State agency and project area administration of certification determination and benefit issuance to eligible food stamp households. The ME review process assures administrative continuity and supports continued program integrity. Regularly scheduled State agency and Federal MEs provide increased opportunity to identify discrepancies and enable problem resolution thereby increasing FSP accountability.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.6.

There are no special circumstances that require information collection inconsistent with 5 CFR 1320.6

8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice.

The 60-day notice (71 FR 58368) for this submission was published on October 3, 2006. FNS did not receive any comments on the proposed information collection.

9. Explain any decision to provide any payment or gift to respondents.

No payments or gifts to respondents are provided under this information collection.

10. Describe any assurance of confidentiality provided to respondents.

Section 11 (e) (8) of the Act and implementing regulations at 7 CFR 272.1 limit the use or disclosure of information obtained from applicant households to persons directly connected with either the administration or safeguarding the integrity of the FSP. The activities covered by this action are to be used only by those directly connected with the administration of the FSP.

11. Provide any justification for any questions of a sensitive nature.

This information collection does not ask any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

FNS estimates that the hour burden of the collection of information for the State agencies to be 492,356 hours. This estimated burden is based on the assumption that it takes the State agency and project areas an average of 216 hours to prepare review schedules, 4320 hours to prepare review plans, 487,820 hours to conduct the ME reviews, which includes 1,620 in recordkeeping hours.

ME Review Schedules

Review schedules are required to be submitted to the appropriate FNS Regional Office no later than 60 days prior to the start of each Federal fiscal year. FNS estimates that it takes 4 hours to prepare a review schedule, and that each of the 54 State agencies would submit one review schedule per year, resulting in a total burden of 216 hours (54 State agencies x 1 schedule x 4 hours).

ME Review Plan

Each State agency is required to submit a review plan annually. The number of hours required to prepare these plans is a function of the number and size of project areas in the State. Not all project areas are reviewed on an annually. FNS estimates that the 54 State agencies annually prepare plan reviews for approximately half of the total number of state project areas. Further FNS estimates that it takes on average approximately 80 hours to develop a comprehensive State review plan, resulting in a total of 4320 hours (80 hours x 54 State plans).

ME Reviews

FNS estimates that it takes an average of 340 hours to conduct a review. It is estimated that ME reviews are conducted for one-half of the total number of project areas (1,430) annually. FNS also estimate that the time necessary for recordkeeping, that is, the time necessary to find and file a record in the conduct of an ME review, is based on 54 record keepers x approximately 30 annual hours per record keeper (1620 hours) annually. Therefore, FNS estimates that it will take approximately 487,820 hours annually to conduct and document ME reviews.

Total Annual Reporting & Recordkeeping Burden

Prepare Review Schedules.....	4 X 54 =	216 hours
Prepare Review Plans.....	80 hrs X 54 =	4,320 hours
Conduct ME Reviews.....	340 hrs X 1,430 =	486,200 hours
Recordkeeping.....	30 hrs X 54 =	<u>1,620 hours</u>
Total Annual Reporting Burden		= 492,356 hours

12a. Estimated cost to respondents of the hour burden.

The cost to State agencies is based on \$28.30 per hour for management analyst staff in accordance with the National Compensation Survey: Occupational Wagers in the United States, July 2003. This rate after 50 per cent reimbursement by FNS is \$14.15.

13. Provide an estimate of the total cost to respondents.

There are no capital, start-up and/or annualized maintenance costs associated with this burden.

14. Provide estimates of annualized cost to the Federal government.

All costs incurred by State agencies in the administration of the management evaluation process are reimbursed at 50 percent. The estimated annual cost to the Federal government for State agency incurred ME expense is approximately \$6.9 million. The estimated expense is calculated by multiplying the total number of burden hours times \$28.30 per hour and dividing by 50 percent.

15. Explain the reasons for any program changes or adjustments.

This is an extension of a currently existing collection the total burden of which is **492,356**.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

Aggregate data on the administrative costs of the FSP including costs per case per month are contained in the State Activity Report that is published annually.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons why that display would be inappropriate.

There is no form associated with this information collection on which to place a date of expiration.

18. Explain each exception to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

There are no exceptions to the Certification Statement. ___

B. Collection of Information Involving Statistical Methods.

The collection does not employ statistical methods.