

SUPPORTING STATEMENT

EMPLOYMENT AND TRAINING PROGRAM ACTIVITY REPORT (FNS-583)

OMB No. 0584-0339

Dale Walton, Project Manager

Office of Emergency Management and Food Safety

Food and Nutrition Service, USDA

3101 Park Center Drive, Room 810

Alexandria, VA 22310

PH: 703-305-2404; FAX: 703-305-2486

Dale.Walton@fns.usda.gov

A. JUSTIFICATION

1. Necessity for collecting information.

The Employment And Training Program Activity administered by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), plays an important role in ensuring as a condition of eligibility, that each non-exempt food stamp household member age 16 to 59 be work registered by the State agency at the time of application and once every twelve months thereafter in compliance of Section 6(d) of the Food Stamp Act of 1977, as amended (the Act), and food stamp regulations at 7 CFR 273.7.

2. Use of information.

In accordance with section 6(d) of the Act and 7 CFR 273.7(c) (8), State agencies must provide quarterly reports about their E&T Programs so that the Department can monitor State performance. Form FNS-583, Food Stamp Employment and Training (E&T) Program Activity Report, was devised to provide FNS a consistent report format for State agency reports. Data collected on the quarterly report includes the number of work registrants, as of October 1 (first quarterly report only), for each quarter (by month, by quarter, and year-to-date) the number of new work registrants, the number of ABAWD applicants and recipients participating in qualifying components; the number of all other applicants and recipients participating in qualifying components; the number of ABAWD case months used under the State agency's 15% exemption allowance, and in addition, for the fourth quarter only, the number of individuals who participated in each component for the entire fiscal year,

The enactment of section 4121 of the Farm Bill directly affected the type and amount of information to be collected from State agencies and significantly reduced the burden associated with that collection. This information collection enables FNS to monitor State E&T programs and to make decisions about funding. For example, 90 percent of the annual E&T grant is based on the number of work registrants (as reported on the FNS-583) in each State as a percentage of work registrants nationwide. The data also helps FNS make supplemental funding decisions throughout the Federal fiscal year.

3. Information technology.

This information collection complies with the E-Government Act of 2002. The Form FNS-583 is available for download to State agencies via the internet from the FNS website (<http://www.fns.usda.gov/fsp/rules/Memo/Support/pdfs/fns-583.pdf>). The State agency may enter data into the electronic FNS-583 online via a secured web system for the Food Program Reporting System (FPRS) <https://fprs.fns.usda.gov/> and it may inspect data it has entered State agencies have requested access to Food, Nutrition and Consumer Services (FNCS) systems via the User Access Request form approved under OMB# 0584-0532. FNCS has used the information collected to grant access to FNCS Systems. Only specific systems require Personal Identifiable Information (PII) in order to grant access. Information that is collected: Name, e-Authentication ID (if exists), telephone number, home zip code, email address, contract expiration date, temporary employee expiration date, office address, State/locality codes, system name, form type, type of access, action requested, comments and special instructions. Currently 50 State agencies submit FNS-583 data electronically.

4. Efforts to identify duplication.

There are no similar data collection efforts.

5. Impact of information collection on small businesses or other small entities.

The information collection does not impact on small business or other small entities.

6. Federal consequences if the collection is not conducted.

If FNS could not collect this information on the FNS-583, it would be unable to make adjustments or allocate exemptions in accordance with the statute. Moreover, if it could not monitor State agencies' quarterly exemption data, FNS could not ensure that exemptions do not exceed the number authorized.

FNS must monitor State agency E&T Program performance to ensure that the Program is being efficiently and economically operated. If unable to collect, on a quarterly basis, the data necessary to oversee program

operations, FNS could not fulfill this mandate, nor could it initiate timely, effective corrective measures to ensure successful State agency program operations.

7. Special circumstances requiring information collection inconsistent with 5 CFR 1320.6.

There are no special circumstances.

8. Public comments received in response to the collection notice.

On May 2, 2008, FNS published the notice in the *Federal Register* (FR) Volume 73, Page 24214. No public comments were received. Every three years State Agency has an opportunity to comment on the notice which is sent out and posted on FNS website. The form has not changed during this submission; however, instructions were provide for clarification of terms.

9. Payments or gifts to respondents.

No payment or gifts are provided to any respondent.

10. Confidentiality.

The FNS-583 will contain a Privacy Act Statement and the data will be stored in a secured database. The System of Record Notice (SORN) for authorization contains personal identifying information on individuals who has access to USDA application and service. Therefore, the Food and Nutrition Service published a Privacy Act Notice SORN on July 26, 2006 Volume 71 pages 42346-48. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act Notice.

11. Sensitive questions

There are no sensitive questions involved in this information collection.

12. Estimated hour burden

(A) *Work registration*. 53 State agencies collect and report information quarterly on new work registrants.

FNS estimates that State agencies report 3.8 million work registrations each fiscal year. FNS estimates that State agencies take an average of 10 seconds (.0028 hours) per record, to compile the data for the FNS-583.

The total burden per year to compile work registration data for the FNS-583 is approximately 10,755 hours (3,844,576 million work registrants x .0028 hours = 10,764.8 hours), or approximately 203 hours per State agency respondent (10,765hours ÷ 53 State agencies =203.11 hours) which is approximately 50.78 hours per report (203.11 hours per State agency per year ÷ 4 quarterly reports = 50.78 hours).

(B) 15 percent ABAWD exemptions. State agencies are required to track the number of optional ABAWD exemptions they use each month. 32 State agencies employ and report the exemptions.

The 32 State agencies track the number of 15 percent exemptions using information technology that best suits the needs of their individual systems of operations. The tracking procedure could be as simple as annotating a file. Therefore, FNS estimates that it takes 10 seconds (.0028 hours) to note each exemption.

The total burden per year to record 15 percent exemptions is approximately 1,710 hours (610,921 total exemptions x .0028 hours = 1,710.6 hours), or 13.28 per State agency response (1710.6 total burden estimate ÷ 128 annual responses ((32 State agencies x 4 responses= 128 annual responses) = 13.4 hours per response).

(C) E&T activities. State agencies use the FNS-583 to report the numbers of applicants and recipients they place in E&T components, both qualifying ABAWD activities and non-qualifying activities. In addition, on the 4th quarter FNS-583, State agencies report the numbers placed into specific components.

FNS estimates that State agencies make approximately 531,343 million placements into E&T components each year. FNS estimates that it takes each State agency 1 minute (0.017 hours) to compile and record the numbers of E&T component placements.

The total annual burden for recording E&T component placements is approximately 9,033 hours (531,343 placements x .017 hours = 9,032.8 hours), or approximately 170.4 hours per State agency respondent (9,033 hours ÷ 53 State agencies = 170.43 hours per State) or 41.772 hours per response (170.43 ÷ 4 responses per State= 42.6 hours per response).

(D) Preparing the FNS-583 report. FNS estimates it takes 1 hour per quarter for each of the 50 automated State agencies to prepare and enter their FNS-583s, a total of 200 hours per year (1 hour x 50 automated State agencies = 50 hours per quarter; 50 hours per quarter x 4 quarters= 200 hours).

FNS estimates it takes the remaining 3 non-automated State agencies 30 minutes each quarter, or 2 hours annually, to prepare and forward their FNS-583s, for a total of 6 hours per year (.5 hour x 3 non-automated State agencies = 1.5 hours quarterly; 1.5 hours quarterly x 4 quarters = 6 hours).

The total annual burden for preparing FNS-583 reports is 206 hours (4 hours per year x 50 State agencies = 200 hours per year; 2 hours per year x 3 State agencies = 6 hours; 200 hours (for automated reporting) + 6 hours (for manual reporting) = 206 hours).

(E) Requests for additional E&T funds: State agencies may request additional E&T funds if needed after initial allocations are made. FNS will reallocate available funds (e.g. funds that are unallocated or funds that are allocated but will not be spent) in a fair and equitable manner. FNS estimates that 10 State agencies per year request additional funds. FNS estimates it takes one hour for a State agency to prepare a request for additional funds.

The total annual burden for preparing requests for additional funds is 10 hours or .19 hours per State (1 hour per request x 10 requests from State agencies = 10 hours per year ÷ 53 states = 0.19 hours per State).

The total annual recordkeeping burden for requesting additional E&T funds is approximately 10 hours (0.19 hours x 53 State = 10.07ours)

The total annual reporting burden Is 21,725 hours (10,765 (work registration) + 1,711 (ABAWD exemptions) + 9,033 (E&T Activities) + 206 (prepare and enter report) + 10 hours (request more funds) = 21,725 hours).

The total annual recordkeeping burden is 30 hours ((212 FNS-583 reports + 10 requests for additional funds = 222) x 0 .137 = 30.34 hours).

The combined total annual reporting and recordkeeping burden is 21,755 hours (21,725 reporting + 30 recordkeeping).

We anticipate that the information collection requirements described in this submission will be performed by administrative type staff at the State agency level at a rate of \$16.92 per burden hour. The total cost is subsequently reimbursed to State agencies through their 100 percent Federal E&T allocations.

ESTIMATED ANNUAL COST TO STATE AGENCIES

Compiling work registration status	\$ 182,144 (10,765 hours x \$16.92 per hour = \$182,144)
15% ABAWD exemptions	\$ 28,933 (1,710 hours x \$16.92 per hour = \$28,933)
E&T activities	\$ 152,838 (9,033 hours x \$16.92 per hour = \$152,838)
Preparing FNS-583 report	\$ 38,341 (206 hours x \$16.92 per hour = \$38,341)

Each year FNS receives 3 FNS-583 forms from the 3 non-automated State agencies that must be entered into FPRS. We used a GS-11 salary for such work. It takes an estimated 1.5 hours annually to enter the 3 FNS-583 reports into FPRS, for a total of **\$69** (3 hours x \$23.07 hour = \$69.21).

Lastly, FNS staff must analyze the data from the FNS-583 reports each quarter. To review the number of 15 percent exemption waivers, we estimated it would take a GS-12, step 3 50 hours annually to analyze the data and perform the calculations necessary to establish each State agency's exemption allowances. Thus the cost of this work is **\$1,783** per year (50 hours x \$35.66 hour = \$1,783). We also estimated that it took a GS-13, step 6 100 hours annually to analyze the other data reported on the FNS-583 report. The cost of this work is **\$4,638** (\$46.38 hour x 100 hours = \$4,638).

\$69 Salary + \$1,783 Salary + \$4,638 Salary = \$6,490 annual cost to the Federal government.

By adding up the above costs, FNS calculated federal costs as \$8,759 for this information collection package (\$2,269 one-time cost + \$6,490 annual cost = \$8,759).

15. Program changes or adjustments reported in Items 13 or 14 of form OMB-83-1.

Fifty-three State agencies operate the E&T Program. Only the burden associated with those State agencies collecting and reporting information quarterly on new work registrants should be assigned to the FNS-583. The number of respondents is 53 State agencies. The number of annual responses increased from 221 to 222 as a result of adding an additional annual request for more funds from State agencies for a total of 10 requests – up from 9 requests – by using the most recent data (2007) on the number of requests received. The number of burden hours decreased from 31,721 to 21,755 hours. While there is an increase in number of work registrants (by 1,525 hours) the substantial decrease in the number of E&T activity placements resulted in fewer total

burden hours (there were 1,231,276 reported E&T activity placements while in 2007 there were 531,343 report placements). This constitutes an adjustment of 9,966 hours.

16. Plans for tabulation and publication.

There are no plans for tabulation and publication of this information collection.

17. Reasons for seeking approval not to display the expiration date of OMB approval.

FNS seeking approval not to display the expiration date on the form and electronic database. By displaying the expiration date on the electronic screens, FNS is required to update the form's programming each time its approval is granted. In addition, not displaying the expiration date on the paper copy would avoid having to reprint the paper copies every three years at some Federal expense and environmental cost. It would also avoid the expense of contract maintenance which would be required to update the database every three years to change the expiration date.

18. Certification exceptions.

There are no exceptions to the certification statement in item 19 of form OMB-83-1.

**COMPILING AND REPORTING FOR THE FNS-583 AND REQUESTS FOR MORE FUNDING
FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM ACTIVITY REPORT**

SECTION OF REGULATION	TITLE	NUMBER OF RESPONDENTS	REPORTS FILED ANNUALLY	TOTAL ANNUAL RESPONSES (C x D)	ESTIMATED NUMBER OF HOURS PER RESPONSE	ESTIMATED TOTAL HOURS (C x D x F)
A	B	C	D	E	F	G
7 CFR 273.7(c)(8)	Compiling work registration status	53	² 4	³ 212	50.7783 x 212	10,765
7 CFR 273.24(g)	15% ABAWD exemptions	¹ 32	4	128	13.3671 x 128	1,711
7 CFR 273.7(f)	E&T activities	53	4	212	42.6076 x 212	9,033
7 CFR 273.7(c)(8)	Preparing FNS-583: States filing electronically	50	4	200 @ 1 hr 12 @ 0.5 hr	.9716 x 212	206
	States filing manually	3	4			
	FNS-583 Reporting Burden				107.7246	21,715
7 CFR 273.7(d)(1)(i)(F)	Preparing requests for more funds after initial allocation	53	.19	10 @ 1 hr	1 x 10	10
7 CFR 277.12	Recordkeeping	53	4.19	222	.137 x 222	30
¹ 21 of 53 State agencies do not use 15% exemptions. ² All burden elements are reported on the FNS-583, which is submitted quarterly.	³ 53 State agencies submit 4 FNS-583s annually for a total of 212 submittals plus 10 requests for additional funds, making a grand total of 222 submittals. TOTAL	53	4.19	222	108.8616	21,755

ATTACHMENTS

- ATTACHMENT A:** FNS–583 Food Stamp Employment and Training (E&T) Program Activity Report. A copy of the currently approved form may also be accessed at the following internet address: <http://www.fns.usda.gov/fsp/rules/Memo/Support/pdfs/fns-583.pdf>
- ATTACHMENT B:** Section 6(d) of the Food Stamp Act of 1977, as amended, which contains Food Stamp Program work requirements and provisions for the Food Stamp E&T Program, is Attachment C. The following internet address provides access to the Food Stamp Act of 1977, as amended:
http://www.fns.usda.gov/fsp/rules/Legislation/pdfs/PL_88-525a.pdf
- ATTACHMENT C:** Section 16(h) of the Farm Stamp Act of 1977, as amended, which contains provisions for funding of the Food Stamp E&T Program. The following internet address provides access to the Food Stamp Act of 1977, as amended:
http://www.fns.usda.gov/fsp/rules/Legislation/pdfs/PL_88-525a.pdf
- ATTACHMENT D:** 7 CFR 273.7 and 7 CFR 273.24 contain regulatory provisions for Food Stamp Program work requirements, State agency reporting requirements, and the E&T Program; and the rules governing the 15 percent ABAWD exemption allowance. The following internet address provides access to food stamp regulations in the CFR.
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=c5778aa81303fbd390e16a1c181a9bef&c=ecfr&tpl=/ecfrbrowse/Title07/7cfrv4_02.tpl
- ATTACHMENT E** Legal Authority Background: Section 6(d) of the Food Stamp Act of 1977, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) (P. L. 104–193), the Balanced Budget Act of 1997 (BBA) (Pub. L. 105–33), Section 4121 of the “Farm Bill,” the Farm Security and Rural Investment Act of 2002 (P. L. 107–171), Section 4108 of the “Farm Bill”, the Food, Conservation, and Energy Act of 2008 (P.L. 100-234).