

SUPPORTING STATEMENT

**REPORT OF COMMODITY DISTRIBUTION FOR DISASTER RELIEF (FNS-292-A) AND
REPORT OF DISASTER FOOD STAMP PROGRAM BENEFIT ISSUANCE (FNS-292-B)**

OMB No. 0584-0037

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A. JUSTIFICATION

1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY:

Food Distribution in disaster situations is authorized under Section 32 of the Act of August 24, 1935, as amended; Section 416 of the Food and Agriculture Act of 1949, as amended; Section 709 of the Food and Agriculture Act of 1965, as amended; Section 4(a) of the Agriculture and Consumer Protection Act of 1973, as amended; and by Sections 409 and 410(b) of the Disaster Relief Act of 1974. Surplus foods are made available by State distributing agencies for relief purposes to victims of natural disasters such as hurricanes, floods, tornadoes, etc. Distribution to these recipients is made primarily through such organizations as the American Red Cross or the Salvation Army. These organizations use surplus foods for both central feeding operations and for distribution to families in homes cut off from normal sources of food supply. Program implementing regulations are contained in 7 CFR Part 250 and include reporting requirements for foods provided for disaster relief purposes. Form FNS-292 A will be used in accordance with 7 CFR 250.43(f) by State distributing agencies to provide a summary report to the agency within 45 days following termination of the disaster assistance.

The Emergency Food Stamp Assistance Program is authorized by the Disaster Relief Act of 1970; The Food Stamp Act, as amended; and in 7 CFR Part 274 of the Food Stamp Program regulations. This program is initiated in a food stamp project area by FNS when all or part of the area has been affected by a disaster. Sections 274.7 of the Food Stamp Program regulations contain requirements that State agencies keep records and submit reports on food stamp benefits issued under disaster procedures "as may from time to time be required by FNS". Form FNS-292-B will be used by State welfare departments to report to FNS the number of households and persons who were certified for the Disaster Food Stamp Program, and also to report the value of benefits issued to those households.

2. HOW, BY WHOM, AND PURPOSE INFORMATION IS TO BE USED:

Information collected on Form FNS-292-A and B will be used by the FNS Administrator, the Food Distribution Division, and the three Food Stamp Program divisions to monitor program activity, assess coverage provided to needy recipients, assure the validity of requested commodity reimbursements and to prepare budget requests. Data from Form FNS-292 has been used in the past to report to the Secretary of Agriculture, the Federal Emergency Management Agency, the White House and Congress on FNS disaster relief efforts. For example, following the hurricanes of 2005, the collected information contributed to a report to the President entitled *The Federal Response to Hurricane Katrina: Lessons Learned*, Appendix B, p. 136, February 2006. If the information were not collected, FNS would be unable to monitor the issuance of food stamp benefits and the distribution of surplus foods during disaster situations. In addition, it would not have the information to respond to requests from multiple agencies on FNS contributions to Federal disaster relief efforts.

State education and welfare agencies that administer FNS nutrition assistance programs will provide the information which is collected only once per disaster per State. Agencies will collect information using electronic forms FNS-292 A and B that can be submitted electronically using Food Program Reporting System (FPRS). A State agency that does not have the capability to respond electronically will continue to use the paper submission process.

3. USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES TO REDUCE BURDEN:

In accordance with the Government Paperwork Elimination Act of 1998 (GPEA) and E-Government of 2002, FNS has reviewed the process for collecting information via Form FNS-292-A and B and

will provide electronic submission of these forms with an alternative for paper submission, if needed.

FNS has separated the disaster relief reporting into two separate forms, FNS 292-A, "Report of Commodity Distribution for Disaster Relief" and FNS-292-B, "Report of Disaster Food Stamp Program Benefit Issuance". The forms will be available in the Food Program Reporting System (FPRS) web-based application found at <https://fprs.fns.usda>. FNS anticipates 99 percent of our responses will be submitted electronically. The separated more user-friendly format will allow all State Agencies to access forms more quickly, report on specific disaster relief activities in detail and submit the forms directly to FNS Regional Offices as required by FNS.

4. EFFORTS TO IDENTIFY DUPLICATION:

There is no similar information available.

5. METHODS TO MINIMIZE BURDEN OF SMALL BUSINESSES OR ENTITIES:

The information collection does not involve small organizations.

6. CONSEQUENCE IF INFORMATION COLLECTION WERE LESS FREQUENT:

Reporting of data is done only "on occasion" after a disaster situation has occurred. However, if information collection was not collected, FNS would be unable to monitor the issuance of food stamp benefits and the distribution of surplus foods during disaster situations and reimburse States appropriately for their disaster relief efforts. In addition, FNS would be unable to respond to White House, Congressional, and outside requests to accurately quantify disaster relief provided by FNS.

7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES IN 5 CFR 1320.6:

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THE FEDERAL REGISTER NOTICE, DESCRIBE ACTIONS TAKEN AND EFFORTS TO CONSULT OUTSIDE AGENCY:

The FNS notice was published in the Federal Register on January 2, 2008, Volume 73, Number 1, Page 157. There was one written comment submitted by a State agency in response to the notice. The State agency agreed with the Federal Register notice and expressed support for the revision of two forms versus one. In addition, the proposed revision has been discussed with State partners at FNS regional meetings held over the past year and has received a positive response.

9. DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS:

There are no plans to provide any payments or gifts to respondents.

10. ASSURANCE OF CONFIDENTIALITY TO RESPONDENTS:

FNS does not offer any assurance of confidentiality to the respondents.

11. QUESTIONS OF A SENSITIVE NATURE:

Form FNS-292-A and B contain no questions of a sensitive nature.

12. ESTIMATE OF THE BURDEN HOUR OF THE INFORMATION COLLECTION:

Form FNS-292-A and B collect information from 110 State agencies whenever FNS assistance is provided during disaster or emergency food relief operations. Based on past experience,

FNS expects to receive approximately a combined total of 55 reports from both forms on an annual basis. Since data to prepare Form FNS-292-A and B is readily available from State agency records, the estimated time for each response is only 25 minutes, for an annual reporting burden of 23 hours overall.

Table A.12.1 – Estimates of Hour Burden

Description of the Collection Activity	Form Number	Number of Respondents	Number of responses annually per Respondent	Total annual responses	Estimate of Burden Hours per response	Total Annual Burden Hours
Commodity Distribution	292-A	55	.5	27.50	.4166667	11.4583333
Food Stamp Benefit Issuance	292-B	55	.5	27.50	.4166667	11.4583333
Totals	-----	110	-----	55	-----	22.9166667

Record Keeping Burden:

The data provided on FNS-292-A and B is part of State agency records maintained for overall program administration. There is record keeping burden associated with these reports. The estimated record keeping time is 25 minutes for each report, for a total annual recordkeeping burden of 23 hours. The total annual burden = 23 hours + 23 hours = 46 hours.

Table A.12.2 Record Keeping Burden

Description of record keeping activity	Number of record keepers	Annual hours per record keeper	Total annual record keeping hours
Commodity Distribution	27.5	.4166667	11.4583333
Food Stamp Benefit Issuance	27.5	.4166667	11.4583333
Totals	55	-----	22.9166667

Annualized Cost to Respondents

According to the United States Bureau of Labor Statistics, Report on Occupational Employment and Wages, May 2006, for the 13-2011 category of accountants working in State government the average hourly rate is \$23.61. The total annualized cost to respondents is 46 hours x \$23.61 per hour = \$1,082.13

TableA.12.3

Description of the Collection Activity	Estimated Total Annual Burden on Respondents	Estimated Average Income per Hour	Estimated Cost to Respondents
Commodity Distribution	22.9166667	\$23.61	\$541.0625007
Food Stamp Benefit Issuance	22.9166667	\$23.61	\$541.0625007
Totals	45.8333333	-----	\$1,082.1250015

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS:

There are no annualized capital/startup/operation costs to respondents associated with this information collection.

14. ESTIMATE OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT:

The Federal cost has been developed by estimating the various costs involved in the design and development of the report; coding, analysis and overhead. The electronic collection system to support the collection has already been developed. There are no employee travel costs or material costs to collect the information.

A.14.1 Estimate of Federal Annualized Cost to the Federal Government

Item	3 Year Projected Total Cost	Average Annual Cost
Employee labor and materials for	\$ 750	\$ 250

developing forms		
Employee labor for developing computer systems, screens and reports to support the collection	\$1,500	\$ 500
Employee travel costs	\$0	\$0
Cost of contractor services	\$1,200	\$ 400
Employee labor and materials for collecting the information	\$0	\$0
Employee labor and materials for analyzing, evaluating, summarizing , and/or reporting	\$6,000	\$2,000
Total	\$9,450	\$3,150

15. CHANGES IN BURDEN:

The number of burden hours has changed from 97 hours to 46 hours due to the transition to an electronic web-based submission system which has decreased the record keeping burden. The prior FNS-292 disaster relief report form has been split into two reports forms with each focusing on only one type of disaster relief; each report now reflects the specific information that will be reported for the response provided by the administering State agency.

16. PLANS FOR PUBLICATION OF INFORMATION:

The information collected is published annually by FNS. The information collection does not employ statistical methods.

17. REASONS TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL:

FNS will display the expiration date on the forms.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IN ITEM 19:

There are no exceptions to the certification statement.