

**SUPPORTING STATEMENT**

**Disaster Supplemental Nutrition Assistance for Victims of Disasters**

**OMB No: 0584-0336**

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**A. JUSTIFICATION**

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

This is a revision of a currently-approved collection (OMB No. 0584-0336). The Disaster Supplemental Nutrition Assistance for Victims of Disasters activity is administered by the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to provide temporary food assistance to victims of disasters after the commercial channels of food distribution have been restored. Like the regular Supplemental Nutritional Assistance Program (SNAP), Disaster Supplemental Nutrition Assistance Program (D-SNAP) benefits are issued to eligible households through electronic benefit transfer (EBT) cards that are used to purchase food at authorized retail food stores.

D-SNAP offers a one-month maximum benefit for household size and provides for streamlined household certification and benefit issuance, to speed assistance to disaster victims and reduce the administrative burdens on State agencies operating in a post-disaster environment. D-SNAP differs from the regular SNAP by taking into account disaster-related expenses in determining eligibility, and using less stringent rules related to compliance with work requirements, non-citizen eligibility, and student status. In addition to serving newly-eligible households, D-SNAP often provides additional supplemental benefits to currently participating households to replace food lost as the result of the disaster.

This information collection (OMB No. 0584-0336) is necessary to provide FNS with the information to determine whether to approve individual requests from State agencies to operate a D-SNAP. The authority to operate D-SNAP is based on multiple legislative sources. Section 5(h) of the Food and Nutrition Act of 2008, formerly the Food Stamp

Act of 1977, as amended and The Disaster Relief and Emergency Assistance Act of 1974, as amended by the Robert T. Stafford Disaster Relief and Assistance Act in 1988, authorize the Secretary of Agriculture to establish temporary emergency standards of eligibility for victims of a disaster if the commercial channels of food distribution have been disrupted and subsequently restored.

Section 11(e)(14) of the Food and Nutrition Act authorizes the Secretary to require State agencies to develop a plan of operation that includes procedures for informing the public about D-SNAP, including how to apply for benefits, coordinating with Federal and private disaster relief agencies and local government officials, developing application procedures to reduce hardship and inconvenience and deter fraud, and instructing caseworkers in procedures for implementing and operating the D-SNAP.

FNS may authorize State agencies to operate D-SNAPs for Presidentially-declared disasters provided the President determines that the disaster is "major" in specified areas, that Federal assistance is necessary, and that commercial food outlets are available where households can use SNAP benefits to purchase adequate amounts of nutritious food. Pursuant to Executive Order 11795 and 7 CFR 280, the Secretary of Agriculture is authorized to determine whether households residing within a "major disaster" area are in need of SNAP assistance and if the disaster-affected households would be better served through the operation of the D-SNAP rather than the regular SNAP.

2. **Indicate how, by whom and for what purpose the information will be used.**

This information collection concerns information that State agencies are required to provide to FNS in support of a request for authority to operate a D-SNAP. A State agency request to FNS to operate a D-SNAP must contain the following information: procedures for promptly assessing

the geographical limits of the areas in need of D-SNAP assistance; household responsibilities; a description of post-disaster reviews; procedures to inform both the general public and households already certified under the disaster program if the operation of the D-SNAP is extended; procedures to issue benefits during a disaster; and procedures to coordinate with other State agencies to obtain additional workers and other personnel if needed to supplement the State agency's regular staff. The D-SNAP request from the State and the Federal approval provide the legal foundation for issuing food assistance to victims of disasters.

The reporting burden related to the certification of households for D-SNAP benefits is included in the reporting burden approved under Food Stamp Forms: Applications, Periodic Reporting, Notices (OMB No. 0584-0064, Expiration Date 12/31/2010) which concerns all information collection activities related to the certification of participating and applicant households. Under SNAP regulations, States are responsible for designing their own forms included in the OMB No. 0584-0064 information collection, including the application for D-SNAP assistance used by individual households. The information collection and recordkeeping activities related to the issuance of D-SNAP benefits to eligible households as well as the various monitoring functions are already included in currently-approved information collections related to those activities for the regular SNAP as a whole. State agencies are required to report D-SNAP participation and issuance on Form FNS-292-B (copy attached), Report of Disaster Food Stamp Benefit Issuance, within 45 days after a disaster. This burden is currently approved under OMB Number 0584-0037 (Expiration Date: 7/31/2011) and will not be reflected in this submission.

3. **Use of information technology or other burden reduction.**

In compliance with E-Government Act of 2002, State agencies have the authority to use the

technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and reporting requirements contained in this submission.

4. **Describe efforts to identify duplication.**

There is no similar information data collection available. The D-SNAP is governed solely by FNS.

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

Information being requested or required has been held to the minimum required for the intended use. This collection does not have a direct impact on small businesses or other small entities. While certain small businesses, specifically retail food stores already authorized to participate in the SNAP, indirectly benefit from the D-SNAP through increased food purchasing power of program recipients, this information collection does not impose any additional information collection or reporting requirements on those businesses.

6. **Consequences if the collection is not conducted or conducted less frequently.**

D-SNAP is the primary FNS nutrition assistance response in the disaster recovery phase. If this collection is not conducted, D-SNAP would not be available to assist disaster victims once they have returned to their homes, their utilities are restored and commercial food supply channels such as grocery stores have reopened. States operate D-SNAP as a major component of the disaster response to meet nutrition needs of affected households. This information is important to preserve program integrity and to ensure that disaster procedures are quickly and effectively implemented. This information can only be collected if and when a disaster occurs.

7. **Special circumstances relating to guideline 5 CFR 1320.5.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. **Comments in Response the Federal Register Notice and Efforts to Consult Outside the Agency.**

A notice was published on March 9, 2009 at 74 FR 9979. No comments were received in response to the notice. As part of the ongoing process of preparing for disasters, FNS routinely consults with State agencies, especially those States that are most likely to experience natural disasters and also participates in multi-agency conferences with other agencies or organizations that are involved in disaster preparation and response, including, but not limited to the Federal Emergency Management Agency (FEMA) and the American Red Cross.

9. **Explanation of any payments or gifts to respondents.**

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

10. **Describe any assurance of confidentiality provided to respondents.**

The Department will comply with the Privacy Act of 1974.

11. **Justification for any questions of a sensitive nature.**

There are no sensitive questions included in this proposed information collection.

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

Based on the experience over the last eight years, FNS estimates that there will be an average of fourteen State agency requests per year to operate a D-SNAP and that each State agency will respond once per disaster to the required criteria. As shown in the table below, we estimate that the preparation of each request, which usually contains a request for waivers of normal SNAP operating procedures and outlines the State's proposed procedures, requires 10 hours of State

agency personnel time.

Affected Public	(b) Form Number	(c) No. Respon dents	Annual Number of Reports	(d) No. Responses Per Respondent	(e) Est. Total Annual Responses (cxd)	(f) Hours Per Response	(g) Total Burden (exf)
<b>Reporting Burden</b>							
State Agencies	N/A	14.00	1.00	1.0	14	10	
<b>Total Annual Burden Estimates</b>		14.00	1.00	1.0	14	10	140

Based on the burden hours shown above, FNS estimates that this information collection will result in a total cost across State agencies of \$2,173 per year. This calculation assumes a net hourly rate for State personnel of \$15.52 per hour (a total hourly rate of \$31.04 less 50 percent Federal reimbursement).

13. **Provide an estimate of the total annual cost burden to respondents or recordkeepers.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

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

The Federal Government pays 50 percent of the SNAP administrative costs incurred by State agencies. This information collection assumes that each disaster requires a total of 20 hours of Federal employee time: 17 hours for a GS-12, step 5 Program Analyst at \$32.25 per hours (\$548.25 per disaster); 0.5 hours for a GS-5, step 5 Secretary at \$14.68 per hour (\$7.34 per disaster); 1.5 hours for a GS-14, step 5 Branch Chief at \$45.32 per hour (\$67.98 per disaster) and 1 hour for a GS-15, step 5, Division Director at \$53.30 per hour (\$53.30 per disaster). Based on these estimated labor hours and cost, the Federal

staffing cost is \$676.87 per disaster and \$9,476 on an annual basis, assuming 14 disasters. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2009. Total Federal costs, including Federal staff and the Federal share of State costs, are \$11,649 per year (Federal employee costs of \$9,476 plus Federal reimbursement of the State employee costs of \$2,173).

**Federal Costs**

Grade	Hours/response	Cost per hour	Cost per Disaster*	Annual Responses	Total Annual Federal Employee cost	Federal share of state cost	Total Federal Cost
GS-12	17	32.25	\$548.25	14	\$7,675.50		
GS-5	0.5	14.68	\$7.34	14	\$102.76		
GS-14	1.5	45.32	\$67.98	14	\$951.72		
GS-15	1	53.30	\$53.30	14	\$746.20		
			\$676.87	14	\$9,476*	\$2,173*	\$11,649*

\*Rounded to the nearest dollar

**15. Explanation for Program Changes or Adjustments.**

This revision of a currently-approved information collection assumes an average of 14 D-SNAPs per calendar year, which is higher than the previously-assumed level. This adjustment is based on an increase in the number of State agencies FNS anticipates will request to operate D-SNAPs. The number of State D-SNAP requests varies greatly from year to year and has ranged from five to 26 per year over the last six years.

**16. Plans for Tabulation and Publication and Project Time Schedule.**

We have no plans to publish statistical analyses in publications.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.



18. **Exceptions to Certification for Paperwork Reduction Act Submissions.**

There are no exceptions to the certification statement.