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United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

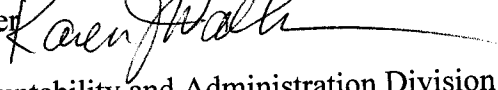
Alexandria, VA
22302-1500

SUBJECT: Justification for a Change in Burden Hours - OMB# 0584-0083
Operating Guidelines, Forms and Waivers

TO: Julie Wise
Office of Management and Budget Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)

THROUGH: Rachele Ragland-Greene
FNS Clearance Officer
Food and Nutrition Service (FNS)

Ruth Brown
OCIO Desk Officer
USDA

FROM: Karen J. Walker 
Director
Program Accountability and Administration Division

This justification requests an increase in burden hours for the Operating Guidelines, Forms and Waivers collection due to additional reporting requirements resulting from the American Recovery and Reinvestment Act (ARRA) of 2009 (Public Law 111-5.) Section 101(c) of ARRA provided increased administrative funding for State agencies that administer the Supplemental Nutrition Assistance Program (SNAP). These agencies use Standard Form (SF) 269 Financial Status Report, approved under OMB# 0348-0039, to report on their use of such administrative funding. As a simple means of accounting separately for ARRA funding, FNS intends to ask these agencies to complete two SF-269's each quarter, one covering the ARRA funds, and one for their regular State administrative funding. Beginning October 1, 2009, SNAP will transition from the SF-269 to the SF- 425, Federal Financial Report, OMB# 0348-0061, unless OMB has approved 0584-NEW, Federal Financial Report Forms (FNS 778 and 778A). An exemption to the use of the SF-425 has been submitted to the Office of Federal Financial Management, OMB.

This additional reporting will require no change to the form, to the approved data elements it includes, or to the number of respondents; the change in burden is limited to the need to provide two responses each quarter, doubling the number of responses for each respondent. We anticipate an increase of 397.5 hours as a result of these increased responses. Each respondent will spend 1.5 hours per response and will provide 5 responses per year. In aggregate, this will increase the total annual number of burden hours for reporting for this collection from 2,848.5 hours to 3,246 hours, which brings the grand total to 3,262 hours, which includes 16 hours for recordkeeping.

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Attached is a copy of the data collection instrument SF-269 (FS) in use for FY 2009. Also, attached is the FNS-778 which FNS plans to use to replace the SF-269 (FS) beginning in FY 2010. FNS will be formally requesting approval for the FNS-778 after the comment period expires in June 2009.

Attachments