

Supporting Statement for  
Paperwork Reduction Act  
Submission for Performance Reporting  
System – Management Evaluation  
OMB Number 0584-0010

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## Table of Contents

### Justification

1. Explanation of Circumstances That Make Collection of Data Necessary .....	3
2. Purpose and Use of the Information .....	3
3. Use of Information Technology to Burden Reduction .....	4
4. Efforts to Identify Duplication and Use of Similar Information .....	4
5. Impacts Small Businesses or Other Small Entities .....	4
6. Consequences of Collecting the Information Less Frequently .....	4
7. Special Circumstance Relating to the Guideline of 5 CFR 1320.5 .....	5
8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency .....	5
9. Explanation of Any Payment or Gift to Respondents .....	5
10. Assurance of Confidentiality Provided to Respondents .....	5
11. Justification for Sensitive Questions .....	7
12. Estimates of Hour Burden Including Annualized Hourly Costs .....	7
13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers....	8
14. Annualized Cost to Federal Government.....	8
15. Explanation for Program Changes or Adjustments .....	8
16. Plans for Tabulation and Publication and Project Time Schedule .....	8
17. Reason(s) Display of OMB Expiration Date is Inappropriate .....	8
18. Exceptions to Certification for Paperwork Reduction Act Submission .....	9

### List of Appendices

- A. Section 11 of the Food and Nutrition Act of 2008
- B. 7 CFR 272.1
- C. 7 CFR 275 Management Evaluation Review Schedule

## **A. Justification**

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

This is a revision of a currently approved information collection associated with Supplemental Nutrition Assistance Program (SNAP formerly known as Food Stamp Program) Performance Reporting System (PRS). Section 11 of the Food and Nutrition Act (the Act) of 2008 requires that State agencies maintain records necessary to ascertain that SNAP 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.

Section 4001-4002 of Public Law 110-246 Food, Conservation and Energy Act (2008) renames the Food Stamp Program to “Supplemental Nutrition Assistance Program” or SNAP.

### 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 SNAP 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 SNAP. 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 SNAP policy and procedures. The State agencies submit their management evaluations to FNS via e-mail or hard copy. There is no official format for the submissions.

3. Use of Information Technology and Burden Reduction.

FNS is committed to complying with the E-Government Act, 2002 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.

4. Describe efforts to identify duplication.

There are currently no known State agencies 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 SNAP integrity.

6. Consequences of Collecting the Information 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 SNAP 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 SNAP accountability.

7. Special Circumstance Relating to the Guideline of 5 CFR 1320.5

There are no special circumstances that require information collection inconsistent with 5 CFR 1320.5

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

FNS regional offices are in constant contact with State agencies and consults with State representatives on issues including Management Evaluations. We routinely glean information on many issues including data collection from these informal consultations.

The 60-day notice (74 FR 57142) for this submission was published on November 4, 2009. 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 SNAP. The

activities covered by this action are to be used only by those directly connected with the administration of SNAP.

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 492,242 hours. This estimated burden is based on the assumption that it takes the State agency and project areas an average of 212 hours to prepare review schedules, 4,240 hours to prepare review plans, 486,200 hours to conduct the ME reviews, which includes 1,590 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 53 State agencies would submit one review schedule per year, resulting in a total burden of 212 hours (53 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 annually. FNS estimates that the 53 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 4,240 hours (80 hours x 53 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 53 record keepers x approximately 30 annual hours per record keeper (1,590 hours) annually.

Therefore, FNS estimates that it will take approximately 486,180 hours annually to conduct and document ME reviews.

**Reporting Burden Estimates:**

Affected Public	Activities	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Total burden hours per SA	Hourly Wage	Total Cost to Respondent
SA	Prepare a review schedule	53	1	53	4	212	\$11.73	\$2,486.76
	Develop State review plan	53	1	53	80	4,240.00	\$11.73	\$49,735.20
	Conduct review	53	26.98	1,429.94	340	486,179.60	\$11.73	\$5,702,886.71
<b>Total Reporting Burden Estimates</b>		<b>53</b>		<b>1,535.94</b>		<b>490,631.60</b>		<b>\$2,877,554.33</b>

**Recordkeeping Burden Estimates:**

Affected Public	Activities	Est. No. of Respondents	No. of Records per Respondent	Total Annual Records per SA	Est. total Hours per Response	Total burden hours per SA	Hourly Wage	Total Cost to Respondent
SA	Recordkeeping	53	1	53	30	1,590.00	\$ 11.73	\$ 9,325.35

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

The cost to State agencies is based on \$23.46 per hour for management analyst staff in accordance with the National Compensation Survey: Occupational Wages in the United States, August 2009. This rate after 50 per cent reimbursement by FNS is \$11.73.

Therefore, the cost to respondents (492,221.60 burden hours x \$11.73= \$5,773,759)

Affected Public	Burden Hours	Cost
Reporting	490,631.60	\$5,755,108.67
Recordkeeping	1,590.00	\$ 18,650.70
<b>TOTAL</b>	<b>492,221.60</b>	<b>\$5,773,769.37</b>

Note\* Total Cost to Respondent rate for Reporting and Recordkeeping is after 50 per cent reimbursement by FNS.

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 over \$8 million. The estimated expense is calculated by multiplying the total number of burden hours times \$23.46 per hour and dividing by 50 percent 492,221.60 rounded to (492,222 x \$23.46 = 11,547,528 ÷ 2 = \$5,773,764). In addition, it took a Management Analyst GS-13 using the 2010 Federal Salary Table 20 hours to prepare this data collection, at (\$48.35) hourly wage rate this cost is \$967 for a total cost of \$5,774,731.

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

This is a revision of a currently existing collection. The current burden inventory is 492,356 and we are requesting 492,222 which is a decrease of 134 due to adjustments. The numbers of respondents were incorrectly reported in the previous submission.

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

There are no plans for statistical analyses in publications.

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

This submission is not seeking OMB approval to not display the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions.

There are no exceptions to the Certification Statement.\_\_\_\_