

**SUPPORTING STATEMENT**

**EMPLOYMENT AND TRAINING PROGRAM ACTIVITY REPORT (FNS-583)**

**OMB No. 0584-0339**

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## Contents

Part A. Justification.....	2
A. 1 Necessity for collecting information.....	2
A. 2 Use of information.....	2
A. 3 Information technology.....	3
A. 4 Efforts to identify duplication.....	3
A. 5 Impact of information collection on small businesses or other small entities.....	3
A. 6 Federal consequences if the collection is not conducted.....	3
A. 7 Special circumstances requiring information collection in an alternative manner.....	4
A. 8 Public comments received in response to the collection notice.....	4
A. 9 Payments or gifts to respondents.....	4
A. 10 Confidentiality.....	4
A. 11 Sensitive questions.....	4
A. 12 Estimated hour burden.....	4
A. 13 Estimated annualized startup and maintenance costs to State agencies.....	7
A. 14 Estimated annual cost to the Federal government.....	8
A. 15 Program changes or adjustments reported in Items 13 or 14 of form OMB-83-1.....	9
A. 16 Plans for tabulation and publication.....	10
A. 17 Reasons for seeking approval not to display the expiration date of OMB approval.....	10
A. 18 Exceptions to Certification Statement.....	10
Part B. Statistical Methods.....	10
List of Attachments.....	<b>Error! Bookmark not defined.</b>

## **Part A. Justification**

### **A. 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 Supplemental Nutrition Assistance Program (SNAP) 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 and Nutrition Act of 2008 and SNAP regulations at 7 CFR 273.7.

### **A. 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, SNAP Employment and Training (E&T) Program Activity Report, was devised to provide FNS a consistent 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 percent 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 2002 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.

### **A. 3 Information technology.**

This information collection complies with the Government Paperwork Elimination Act of 1998 and 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 Service (FNS) systems via the User Access Request form approved under OMB# 0584-0532. FNS has used the information collected to grant access to FNS 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.

### **A. 4 Efforts to identify duplication.**

There are no similar data collection efforts.

### **A. 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.

### **A. 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.

**A. 7 Special circumstances requiring information collection in an alternative manner.**

There are no special circumstances.

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

On July 20, 2011, FNS published the notice in the *Federal Register* (FR) Volume 76, Page 43253. No public comments were received. Every three years each State Agency has an opportunity to comment on the notice which is sent out and posted on FNS website.

**A. 9 Payments or gifts to respondents.**

No payment or gifts were provided to any respondent.

**A. 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.

**A. 11 Sensitive questions**

There are no sensitive questions involved in this information collection.

**A. 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 5.7 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 15,931.76 hours (5,723,991 work registrants x .0028 hours = 15,931.76 hours), or approximately 300.60 hours per**

**State agency respondent (15,931.76 hours ÷ 53 State agencies =300.60 hours) which is approximately 75.15 hours per report (300.60 hours per State agency per year ÷ 4 quarterly reports = 75.15 hours).**

*(B) 15 percent ABAWD exemptions.* State agencies are required to track the number of optional ABAWD exemptions they use each month. Currently, 7 State agencies employ and report the exemptions.

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 567.42 hours (203,866 total exemptions x .0028 hours = 567.42 hours), or 20.27 per State agency response (567.42 total burden estimate ÷ 28 annual responses ((7 State agencies x 4 responses= 28 annual responses) = 20.27 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 560,005 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 9,333.04 hours (560,005 placements x .017 hours = 9,333.04 hours), or approximately 176.10 hours per State agency respondent (9,333.04 hours ÷ 53 State agencies = 176.10 hours per State) or 44.02 hours per response (176.10 ÷ 4 responses per State= 44.02 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 14 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 14 hours or 0.26 hours per State (1 hour per request x 14 requests from State agencies = 14 hours per year ÷ 53 states = 0.26 hours per State).**

**The total annual recordkeeping burden for requesting additional E&T funds is approximately 14 hours (0.26 hours x 53 State = 14 hours)**

*The total annual reporting burden is 26,052.22 hours (15,931.76 (work registration) + 567.42 (ABAWD exemptions) + 9,333.04 (E&T Activities) + 206 (prepare and enter report) + 14 hours (request more funds) = 26,052.22 hours).*

*The total annual recordkeeping burden is 30.89 hours ((212 FNS-583 reports + 14 requests for additional funds = 222) x 0.137 = 30.89 hours).*

*The combined total annual reporting and recordkeeping burden is 26,083.11 hours (26,052.22 reporting + 30.88 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**

<i>Compiling work registration status</i>	<b>\$ 182,144</b> (15,931.76 hours x \$16.92 per hour = \$269,565.31)
<i>15% ABAWD exemptions</i>	<b>\$ 28,933</b> (567.42 hours x \$16.92 per hour = \$9,600.75)
<i>E&amp;T activities</i>	<b>\$ 152,838</b> (9,333.04 hours x \$16.92 per hour = \$157,915.09)
<i>Preparing FNS-583 report</i>	<b>\$ 38,341</b> (206 hours x \$16.92 per hour = \$3,485.52)
<i>Preparing request for more funds</i>	<b>\$ 169</b> (14 hours x \$16.92 per hour = \$136.88)
<b>Total Annual Cost to State Agencies</b>	<b>\$440,803.55</b>

#### **A. 13 Estimated annualized startup and maintenance costs to State agencies.**

There are no startup or annualized maintenance costs.

#### **A. 14 Estimated annual cost to the Federal government.**

The annual estimated cost to the Federal government for the FNS-583 information collection and fund request is **\$9,525**. FNS has calculated the costs as follows.



Using the 2011 GS Salary Table, we estimate it took 20 hours for a GS–13 (step 6) to prepare the 60–day Notice, and complete the ICR package, for a total of **\$995** (20 hours x \$49.77 an hour = \$995.40).

Once the GS–13–6 completed the two documents, they were reviewed and cleared by appropriate FNS officials. We used a GS–14, step 1, as the average hourly salary for these reviewing officials. We estimate it took four reviewing officials 4 hours to clear the 60–day Notice and the ICR package for a total of **\$807** (4 hours x \$50.41 an hour x 4 staff = \$806.56).

It cost **\$636** to publish the 60–day Notice in the Federal Register.

We estimate that it takes 1 hour for a GS–13, step 6, to prepare the electronic file and submit to the agency webmaster, a GS 14, step 5, who converts to the file to an Internet friendly format and posts the form to the Internet. Total cost is **\$107** ((\$49.77 an hour x 1 = \$49.77) + (\$57.13 an hour x 1 = \$57.13) = , \$46.38 + \$53.24 = \$106.90).

**\$995 Salary + \$807 Salary + \$736 publishing costs + \$107 Salary = \$2,545 one time cost.**

Each year FNS receives three FNS–583 forms from the three non–automated State agencies that must be entered into FPRS by Regional FNS staff. We used a GS–11, step 1, salary for such work. It takes an estimated 3 hours annually to enter the three FNS–583 reports into FPRS, for a total of **\$90** (3 hours x \$29.93 hour = \$89.79).

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 50 hours annually for a GS–12, step 3, to analyze the data and perform the calculations necessary to establish each State agency’s exemption allowances. Thus the cost of this work is **\$1,914** per year (50 hours x \$38.27 hour = \$1,913.50). We also estimated that it would take 100 hours annually for a GS–13, step 6, to analyze the other data reported on the FNS–583 report. The cost of this work is **\$4,977** (\$49.77 hour x 100 hours = \$4,977).

**\$90 Salary + \$1,914 Salary + \$4,977 Salary = \$6,980 annual cost to the Federal government.**

**By adding up the above costs, FNS calculated federal costs as \$9,525 for this information collection package (\$2,545 one-time cost + \$6,980 annual cost = \$9,525).**

**A. 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 222 to 226 as a result of adding an additional annual request for more funds from State agencies for a total of 14 requests – up from 10 requests – by using the most recent data (2010) on the number of requests received. The number of burden hours increased from 21,755 to 26,083 hours. Most of the increase is due to a higher number of work registrants (there were 3.8 million work registrants in 2007 and 5.7 million in 2010). This resulted in an increase of 5,177 hours (15,931.76 hours – 10,755 hours). The number of E&T activity placements also increased by 299 hours (9,333.04 hours - 9,033.80 hours). Although the number of work registrants and E&T activity placements increased, the number of State agencies using 15 percent exemptions decreased. In 2010, most States had statewide waivers of ABAWD time-limits and did not use 15 percent exemptions. The number of States using 15 percent exemptions decreased from 32 to 7 State agencies. Thus, the burden hours for 15 percent exemptions decreased by 1,143 hours (547.42 hours – 1,710.6 hours). In total, these changes constitute an overall upward adjustment of 4,328 hours.

**A. 16 Plans for tabulation and publication.**

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

**A. 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.

**A. 18 Exceptions to Certification Statement.**

The agency is able to certify compliance with all provisions under Item 19 of form OMB-83-1.

**Part B. Statistical Methods**

**Collection of information employing statistical methods**

No statistical methods are involved.

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

<b>SECTION OF REGULATION</b>	<b>TITLE</b>	<b>NUMBER OF RESPONDENTS</b>	<b>REPORTS FILED ANNUALLY</b>	<b>TOTAL ANNUAL RESPONSES (C x D)</b>	<b>ESTIMATED NUMBER OF HOURS PER RESPONSE</b>	<b>ESTIMATED TOTAL HOURS (C x D x F)</b>
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>
7 CFR 273.7(c)(8)	Compiling work registration status	53	<sup>2</sup> 4	<sup>3</sup> 212	75.15 x 212	15,931.76
7 CFR 273.24(g)	15% ABAWD exemptions	<sup>1</sup> 7	4	28	20.27 x 28	567.42
7 CFR 273.7(f)	E&T activities	53	4	212	44.02 x 212	9,333.04
7 CFR 273.7(c)(8)	Preparing FNS-583: States filing electronically	50	4	200 @ 1 hr	.9716 x 212	206
	States filing manually	3	4	12 @ 0.5 hr		
Reporting Burden for FNS-583					140.41	26,052.22
Recordkeeping burden for FNS-583		53			0.13666 7 x 212	28.97
Total Reporting						26,067.19

&Recordkeeping For FNS-583						
7 CFR 273.7(d)(1) (i)(F)	Preparing requests for more funds after initial allocation	53	.2641	14 @ 1 hr	1 x 14	14
	Record-keeping burden for additional requests				14 x 0.136667	1.91
Total Reporting & Recordkeeping Burden for Addt'l Funds Requests						15.91
Reporting Burden for both FNS-583 and Additional Funds Requests						26,052.22
7 CFR 277.12	Total Recordkeeping Burden for both FNS-583 & Additional Funds Requests	53	4.2641	226	.137 x 226	30.88
<b>TOTAL ALL BURDENS</b>		53	4.2641	226	141.55	26,083.10

1 – Seven of 53 State agencies use 15% exemptions

2 – State agencies report burden elements on the FNS-583, submitted quarterly

3 – State agencies submit four FNS-583's annually for a total of 212 submittals plus 14 requests for additional funds for a total of 226 submittals