

SUPPORTING STATEMENT

Supplemental Nutrition Assistance Program Prescreening Tool

OMB No: 0584-0519

Larry Tropp, Project Officer

Supplemental Nutrition Assistance Program

Program Development Division, Certification Policy Branch

Food and Nutrition Service, USDA

3101 Park Center Drive, Room 812

Alexandria, VA 22310

PH: 703-305-2504 FAX: 703-305-2486

Larry.Tropp@fns.usda.gov

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A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This collection is a revision of a currently-approved collection, Supplemental Nutrition Assistance Program: Supplemental Nutrition Assistance Program Prescreening Tool OMB No. 0584-0519. In June 2003, the Food and Nutrition Service (FNS) deployed an interactive web-based pre-screening tool that can be utilized by the general public to determine potential eligibility for benefits in the Supplemental Nutrition Assistance Program (SNAP). Once the user enters household size, income, expenses and resource information, the tool will calculate and provide the user with an estimated range of benefits that the household may be eligible to receive. Since SNAP eligibility and benefit amount may vary by location, FNS makes it clear that the tool is only an estimator and the household will need to contact the local agency to determine actual eligibility and the appropriate benefit amount. Other data collected are:

- State: State or territory in which the user resides;
- Citizenship: whether each member is a U.S. citizen;
- Number of Children: number of children in the household;
- Number of Elderly: number of elderly members in the household;
- Migrant Workers: is anyone in the household a seasonal or migrant farm worker;
- Homeless: is the household homeless or living in a shelter;
- User Type: who is using the tool; and

- User Referral: how the user heard about the tool.

Although the tool also requests the name and age of the user, FNS does not retain this information nor does it request other personally identifiable information such as social security numbers, birthdays, etc. about the household itself in the tool. However, the system does request the following information during the initial process in which the user enters data:

- Whether the user is using the tool for personal reasons or on behalf of others; and
- If they are using it on behalf of others, the user will be asked to identify him/herself (e.g., relative of a person in need, advocacy organization, faith-based group, etc.) using a drop down menu.

Once the user logs out of the system, none of the user-provided information is retained by FNS.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This information is used solely by prospective participants in SNAP to determine if they are eligible for assistance and if eligible the amount of benefits to which they may be entitled. The tool does not request any personally identifiable information and nor is any of the information entered by users retained by FNS.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any

consideration of using information technology to reduce burden.

FNS has made every effort to provide for electronic submission as an alternative to paper submission in compliance with the E-Government (E-Gov) Act, 2002. To make the pre-screening tool available to the widest possible audience, it is a web-based system with minimal requirements imposed on the end-user's personal computer. It does not require the user to install any plug-ins or java applets. The interface is straightforward and simple, requires only the minimal computer literacy, and makes maximum use of drop down menus, selection lists and radio buttons. The internet address of the prescreening tool is <http://www.snap-step1.usda.gov/fns/>. Screenshots of the opening page of the tool as well as the pages based on a hypothetical eligibility determination are attached for reference. All of the data is collected electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

Every effort has been made to avoid duplication. FNS has reviewed other government and private agencies websites. It was concluded that similar data sources exists because FNS encourages State agencies to develop their own State-specific prescreening tools. The FNS prescreening tool is directly linked to available State-specific tools. The State specific prescreening tool preempts the FNS prescreening with the user entering data into the State-specific tool rather than the FNS National tool.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

State agencies are involved in the administration of SNAP at the state level and the data collection for this effort. All State agencies deliver the same program benefits and perform the same function regardless of population size. This information collection does not have a direct impact on any small entities. Out of 53 State agencies 0 are considered small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

FNS offers the pre-screening tool to help low income individuals assess their potential eligibility for SNAP benefits and, if potentially eligible, provides users with the amount of benefits to which they may be entitled. Without the pre-screening tool, potential applicants would be able to assess their eligibility by either researching the program's eligibility criteria or through visiting a local office. Either alternative would be labor intensive than the use of the prescreening tool. Research has shown that the primary reason that potentially eligible persons do not apply for SNAP assistance is because they are not aware that they may be eligible. Potential participants are more likely to apply after using a pre-screening tool. As such, the pre-screening tool helps FNS meet strategic objectives to increase SNAP participation.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that cause this information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d). Describe efforts to consult with persons outside the agency to obtain their views on the availability of data,**

frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

The agency notice soliciting comments regarding this information collection was published on September 20, 2011, in the Federal Register at 76 FR 58237 (included with this submission).

The Department received no comments on this information collection. FNS regularly consults with State agencies and public interest groups and takes into consideration any suggested changes regarding the tool.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There was no decision to provide payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The No additional assurance of confidentiality is provided with this information collection. Any and all information obtained in this collection shall not be disclosed except in accordance with 5 U.S.C.552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their

consent.

No private or sensitive questions will be asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The estimated reporting burden for each individual component of this information collection, including the number of respondents, frequency of response, average time to respond and annual hour burden is shown in Table 1(below) and described in more detail following the table. _

OMB # 0584-0519	Requirement	Estimated # of Respondents	Response annually per respondent	Total Annual Responses	Hours Per Response	Annual Burden Hours
Affected Public Potential SNAP clients						
Reporting Burden	Completion of SNAP Prescreening Tool	396,000	1	396,000	0.167	66,132
	Reporting Totals	396,000	1	396,000	0.167	66,132

Recordkeeping Burden	Recordkeeping	0	0	0	0	0
	Recordkeeping Totals	0	0	0	0	0
	Total Recordkeeping and Reporting Burden	396,000		396,000	0.167	66,132

- a. Reporting burden: The reporting burden associated with this information collection is the time required by potential applicants for SNAP benefits to complete the prescreening tool of approximately 10 minutes or 0.167 hours. Based on use of the tool by 396,000 potential applicants for assistance, FNS has calculated a total annual reporting burden of 66,127 hours (396,000 respondents x 0.167 hours per response).
- b. Record keeping burden only: There is no separate recordkeeping directly associated with this information collection. FNS does not retain any information provided by users of the prescreening tool nor does FNS maintain any records regarding usage of the tool.
- c. Number of responses: 396,000 based on the number of potential applicants who will access the prescreening tool.

12c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. Do not include the cost of contracting out or paying outside parties for information collection activities here, these costs should be included in item 14.

The respondents using the tool are potential applicants for SNAP benefits. The following cost estimate is based on the current Federal minimum wage of \$7.25 per hour x 66,132 hours.

General public/Potential Applicant for SNAP benefits based on the Federal minimum wage of \$7.25 per hour.	Hours	Cost (US\$)
Entry of data into the SNAP online pre-screening tool by potential applicants for SNAP benefits.	66,132	\$479,457
Total Cost to potential applicants		\$479,457

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

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

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The estimated annual cost to the Federal government is \$24,480 for maintenance, operating, and hosting tasks.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of**

the OMB Form 83-1.

Since this information collection was last extended, participation in the program increased by approximately 50 percent, primarily the result of significantly higher unemployment leading to increased participation. The estimate is based participation data extracted from the FNS National Databank using a comparison in participation for the 3-year period prior to the current burden estimate with participation data for the last two years. Assuming a similar increase in the number of potential applicants who will use the prescreening tool, FNS projects there is an annual burden adjustment of 66,132 hours representing an increase of 22,132 over the burden estimate of 44,000 hours used in the current approval of this information collection. Because none of the data entered by users is retained, there is no recordkeeping requirement associated with this information collection.

Current OMB inventory: **44,000 hours**

Total annual hours requested: **66,132 hours**

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

There are no plans to publish statistical analyses.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate

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

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.