

SUPPORTING STATEMENT

Disaster Supplemental Nutrition Assistance for Victims of Disasters

OMB No: 0584-0336

Arianne Steed, 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: 703-305-2521 FAX: 703-305-2504

Arianne.Steed@fns.usda.gov

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Enclosed:

- Section 5(h) of the Food and Nutrition Act of 2008
- Sec. 412 -Disaster Relief and Emergency Assistance Act as Amended by the Stafford Act)
- 65 FR 17251
- D-SNAP 60-day FR Notice
- Attachment A - Sample Disaster-Application
- Attachment B - FNS-292B

Appendices

- A. Public Comment No. 1
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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 is an extension of currently approved collection under the Office of Management and Budget (OMB) package No. 0584-0336. This information collection is necessary for the Food and Nutrition Service (FNS) of the Department of Agriculture (USDA) to approve State agencies' requests to operate a Disaster Supplemental Nutrition Assistance Program (D-SNAP).

The Disaster Relief and Emergency Assistance Act (1974), as amended by the Robert T. Stafford Disaster Relief and Assistance Act (1988) (enclosed), and Section 5(h) of the Food and Nutrition Act of 2008 (P.L. 110-246), the "Act" (enclosed), provide the Secretary of Agriculture with the authority to develop the D-SNAP to address the needs of families temporarily in need of food assistance after a disaster.

D-SNAP is a program that is separate from the Supplemental Nutrition Assistance Program (SNAP) and is conducted for a specific period of time. In order for a State to request to operate a D-SNAP, an affected area in the State must have received a Presidential declaration of "Major Disaster" with Individual Assistance. Once the declaration is in place, the State submits to FNS a request to operate a D-SNAP. FNS reviews the request to ensure that all the necessary requirements to conduct D-SNAP are met. Upon approval of a D-SNAP, FNS provides the State support in their D-SNAP efforts through policy guidance, training, and technical assistance.

Since each disaster demands a separate D-SNAP program, a State can submit multiple requests to FNS to operate multiple D-SNAPs.

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

This information collection accounts for information that State agencies are required to provide to FNS in support of a request to operate a D-SNAP. A State agency requesting to operate a D-SNAP should follow the instructions per the FNS Disaster SNAP Guidance¹ and submit the following information in their request: Description of incident; geographic area; application period; benefit period; eligibility criteria; ongoing households eligibility; affected population; electronic benefit card issuance process; logistical plans for Disaster SNAP rollout; staffing; public information outreach; duplicate participation check process; fraud prevention strategies; and employee application procedures. FNS reviews the request to ensure that all the necessary requirements to conduct a D-SNAP are met. Upon receipt of FNS' approval, the State can begin to operate the D-SNAP.

The D-SNAP certification burden is included in the currently approved reporting burden under the OMB No. 0584-0064, SNAP: Applications, Periodic Reports, and Notices (expiration date 03/31/2013), which includes all information collection activities associated with the certification of participating and applicant households. Under SNAP regulations, States are responsible for designing their own forms (this burden is included in the OMB No. 0584-0064) including the application for D-SNAP assistance used by individual households. A sample D-SNAP application, which may be used by States but

is not required, is attached for reference (see Attachment A). State agencies are required to report D-SNAP participation and issuance on Form FNS-292-B, Report of Disaster Supplemental Nutrition Assistance Benefit Issuance (see Attachment B), within 45 days after a disaster. This burden is currently approved under OMB No. 0584-0037 (expiration date: 07/31/2014) and will not be reflected in this submission.

- 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.**

In compliance with E-Government Act of 2002 (E-Gov), 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. FNS has reviewed the process for collecting information via Form FNS 292-B and will provide electronic submission of these forms with an alternative for paper submission, if needed.

FNS anticipates 100 percent of responses will be submitted electronically. This format allows all State agencies to access forms quickly, report on specific disaster relief activities in detail, and submit the forms directly to FNS Regional Offices as required by FNS. FNS does not receive client-specific data, such as applications or individual case records.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

Each D-SNAP request results in a separate program operation and requires a separate benefit application form. Therefore, no similar information is available. FNS solely monitors issuance of D-SNAP benefits. The information required in the benefit application form is maintained by the local State agencies, and it is not reported to any other entity. Every effort has been made to avoid duplication.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

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 by program recipients, this information collection does not impose any additional information collection or reporting requirements on those businesses.

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.

D-SNAP is the primary FNS nutrition assistance response in a disaster recovery phase. It is a separate program from the regular SNAP with different eligibility requirements. The information obtained in a D-SNAP request is crucial in order for FNS to approve each D-SNAP operation. If this collection is not conducted, D-SNAP would not be available to help meet the nutritional needs of disaster victims. The information collection is also important to preserve program integrity and to ensure that disaster procedures are promptly and effectively implemented.

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. The collection of information is conducted in a manner consistent with the guidelines in 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), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The FNS notice was published in the Federal Register on April 27, 2012, Volume 77, Number 82, Page 25127. The 60-day comment period ended on June 26, 2012. A total of 2 comments were received. These comments were not germane to our data collection and contact information was not provided by the commenters. Both comments are included with this information collection.

FNS national and regional offices have worked closely with State agencies in coordinating disaster response efforts and FNS has not received information from affected State agencies that necessitate a change to the data collection instrument or the frequency of collection.

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

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

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

The respondents involved in this collection will be managers at the State agencies responsible for the completion of D-SNAP requests. The requests provide State agency data necessary for approval of a D-SNAP. The information includes: Description of incident; geographic area; application period; benefit period; eligibility criteria; ongoing households eligibility; affected population; electronic benefit card issuance process; logistical plans for Disaster SNAP rollout; staffing; public information outreach; duplicate participation check process; fraud prevention strategies; and employee application procedures.

The information provided in the D-SNAP requests does not include personal identifying information that requires confidentiality measures.

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.

There are no sensitive questions, as described above, included in this information collection.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. 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.

Based on FNS’ disaster data for the last six years, it is estimated that an average of 14 State agencies will submit requests to operate a D-SNAP per year and each State agency will submit one request per disaster. As shown in the table below, we estimate that the preparation of each request requires 10 hours of State agency personnel time. The D-SNAP request normally contains a request to waive the normal SNAP operating procedures and outlines the State’s proposed procedures including: Description of incident; geographic area; application period; benefit period; eligibility criteria; ongoing households eligibility; affected population; electronic benefit card issuance process; logistical plans for Disaster SNAP rollout; staffing; public information outreach; duplicate participation check process; fraud prevention strategies; and employee application procedures.

OMB #	Estimated #	Report Filed	Total Annual	Estimated	Estimated
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0584-0336 Affected Public	Respondents	Annually	Responses	Avg. No. of Man-hours Per Response	total man- hours
Reporting Burden					
State Agencies D-SNAP Requests	14	1	14	10	140
Total Annual Burden Estimate					140

Respondents involved in this collection will be managers at the State agency level, which corresponds to the Bureau of Labor Statistics Category 11-9151, Social and Community Service Managers. Based on the most recent Occupational Employment and Wage Estimates from May 2010, workers in this category employed by State Governments earn an hourly mean wage of \$31.68. States that administer SNAP receive 50% Federal reimbursement which assumes a net hourly rate for State personnel of \$15.84 per hour (a total hourly rate of \$31.68 less 50 percent Federal reimbursement). According to the burden hours shown above, FNS estimates that this information collection will result in a total cost across State agencies of \$2,217.60 per year ($\$31.68 \times 140 \text{ hrs} = 4,435.2 \times 50\% = 2,217.60$).

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 questions 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/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. 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 Federal Government pays 50 percent of the program administrative costs incurred by State agencies. This information collection assumes that each D-SNAP request requires a total of 20 hours of Federal employee time: 17 hours for a GS-12 Program analyst, 0.5 hours for a GS-7, Administrative staff; 1.5 hours for a GS-14, Branch Chief and 1 hour for a GS-15, Division Director. Based on these estimated labor hours and cost, the Federal staffing cost is \$755 per disaster and \$10,569.79 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 2012. Total Federal costs, including Federal staff and the Federal share of State costs, are \$12,787.39 per year (Federal employee costs of \$10,569.79 plus Federal reimbursement of the State employee costs of \$2,217.60).

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	35.88	\$609.96	14	\$8539.44		
GS-7	0.5	20.22	\$10.11	14	\$141.54		
GS-14	1.5	50.41	\$75.62	14	\$1058.61		
GS-15	1	59.30	\$59.30	14	\$830.20		
			\$755*		\$10,569.79	\$2,217.60	\$12,787.39

*Rounded to the nearest dollar

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

No program changes or adjustments resulted from this information collection.

Therefore, the burden hours remain unchanged.

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

FNS has no plans to publish information obtained as a result of this information collection.

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 of the OMB 83-I " Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.

¹ http://www.fns.usda.gov/disasters/response/D-SNAP_Handbook/D-SNAP_handbook.pdf