

Supporting Statement for Paperwork Reduction Act Supplemental Nutrition Assistance Program (SNAP)

Assessment of Alternatives to Face-to-Face Interviews in SNAP

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.**

Several states have acquired waivers to postpone or eliminate the face-to-face interview that is otherwise required for Supplemental Nutrition Assistance Program (SNAP) certification and recertification. Views vary on the difference this makes with respect to customer service, program access and payment accuracy, and there is limited evidence of waiver impacts. This pilot is designed to compare program outcomes associated with no interviews with the outcomes of the customary ways of screening applicants for SNAP benefits. The pilot will be conducted in three states. Impacts on customer service, program access, payment accuracy, as well as client satisfaction and administrative costs will be assessed. The information to be collected is not mandated by law or regulation.

FNS will post the Request for Application (RFA) package for the *Assessment of Alternatives to Face-to-Face Interviews in SNAP* on its website and on www.grants.gov on or about June 30, 2011.

- 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.**

The primary users of the information collected from the applicants are FNS staff that will review, evaluate and approve the cooperative agreement applications and recommend the applicants most likely to meet program objectives. The selection criteria are contained in the RFA package and applications will be evaluated and scored by the FNS panel of experts.

All applicants must complete the following forms:

The following grants.gov forms are required of grant applicants, which are located at http://www.grants.gov/agencies/aforms_repository_information.jsp:

1. SF-425
2. SF-424 (R&R)

3. Assurance for Non-Construction Programs (SF-424b)
4. R&R FedNonFed Budget; [Provide a budget for each funding year requested along with a budget summary]
5. R&R Sub-award Budget Attachment(s)Form [If applicable attach the proposed sub-award budget as a PDF document for each funding year with a budget summary]
6. Project/Performance Site Locations(s)
7. Research & Related Senior/Key Personnel [attach résumé or curriculum vitae of key personnel]
8. Research and Related Senior/Key Person Profile (Expanded) [Not required, use when needed]
9. HHS Checklist (08-2007) [E.O. 12372, only applicable to participating states]

The following OMB form is required, which is located at:

<http://www.whitehouse.gov/sites/default/files/omb/grants/sfllin.pdf>:

SF LLL (Disclosure of Lobbying Activities): Indicate on the form whether your organization intends to conduct lobbying activities. If your organization does not intend to lobby, write “Not Applicable.”

USDA Grant Certification Forms: The following USDA forms are located on the following website http://www.ocio.usda.gov/forms/ocio_forms.html

1. AD-1047 Certification Regarding Debarment, Suspension, and Other Responsibility Matters;
 2. AD-1048 Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction (Must submit with application only if a Sole Source Contractor is identified); and
 3. AD-1049 Certification Regarding Drug-Free Workplace Requirements.
- 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 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the application from the www.grants.gov website. Additionally, applicants must apply for this opportunity directly through www.grants.gov. FNS will not accept e-mailed, faxed or paper-delivered applications.

FNS estimates approximately, 100% of these responses will report electronically Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>

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.

There is no similar data collection effort available. This program solicitation is new and unique. There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS is in search for innovated research projects to assist the SNAP population.

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

The information request is held to the minimum amount required to understand the impact of eliminating client interview at certification and recertification on customer service, program access, payment accuracy, client satisfaction and administrative.

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 will seek minimal information that will be critical to conducting a rigorous pilot of the impact of eliminating client interview on program outcomes. Reduced frequency is not possible as all required data must be collected during the time that the demonstrations are being 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 that would require the collection of information to be conducted in the 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, 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.**

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

A 60-day notice was published in the Federal Register on August 20, 2008, (Volume 73, Number 162, page 49159-49160) soliciting comments on FNS' intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs. This was a revision of a previously approved package. FNS received one public comment in response to the Federal Register notice.

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

There are no plans 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.**

Provision of the information requested is entirely voluntarily. The collection of this information is for the purpose of aiding in the review of applications prior to cooperative agreement award decisions and for management of cooperative agreements. This information will be used within FNS and may also be disclosed outside FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement honor the existing policy with regard to confidentiality. FNS will work with the award recipients and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act, which requires that award recipients provide release permission and are informed of the use of the information.

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 questions of a sensitive nature included in this data collection.

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**

FNS estimates that approximately ten (10) respondents may submit an application. It is estimated that the average applicant will spend 120 hours designing and constructing their proposals. This is based on the general fact that applicants will have about two months to complete their proposals.

A.12.1 Estimate of Burden Hours on Respondents for Application

Type of Respondent	Grant Application Used	Estimated No. of Grant/CA Applications (Responses)	Estimated Time to Complete each Application	Total Estimated Burden Hours
Pre-Awardee Grantee (State Agencies)	“Miscellaneous Grants Expected to be Authorized by Congress”	10	120	1,200

Respondents have a full range of discretion in how they design and develop a proposal. FNS has provided guidance in the RFA on the information that is needed to evaluate the proposals and select the most promising grantees. Hourly estimates identified above are used as the basis for determining total annual cost burden to respondents and grantees.

A.12.2 Estimates of Annualized Cost to Respondents for Application

Type of Respondents	Number of Respondents	Average Time per Response (hours)	Frequency of Response	Hourly Wage Rate	Respondent Cost
Pre-Awardee Grantee	10	120	1	\$45	\$54,000

FNS estimates that each respondent will utilize at least one staff person at a cost of \$45 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable. Wage rates were determined using the <http://www.bls.gov/bls/wages.htm> website, and reflects mean average hourly rate for occupation code 11-0000, Administrative Services Manager occupations in the May 2010 National Occupational Employment and Wage Estimates.

Post-award burden hours are based on the production of the quarterly (including financial report) and final progress reports that will be submitted to FNS by the three states that will be selected for the project.

These reports will ask for a description of the activities that took place during the previous quarter and report any deviations and difficulties. The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous quarter, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant.

For the purpose of this burden estimate, 3 grantees will be awarded funds. The total estimated burden on the 3 winning grantees of post award burden is reflected in the following table:

Action	Number Respondents	No. Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Post-Awardees					
Quarterly Progress and Financial Reports	3	4	12	4	48
Annual Report	3	1	3	20	60
Final Report (progress and financial)	3	1	3	80	240
Total Hours	3	-	18	-	348

Total Pre-award cost to the public is 1,200 hours x \$45.00 hourly wage = \$54,000. Pre-award costs are one-time only costs.

Total Post-award annual costs for routine reporting are 348 hours x \$45.00 = \$15,660. Post award costs are annual costs for the duration of the project.

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/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.

Costs are estimated for two categories:

- 1) Cooperative Agreement costs, which are expected to total about \$450,000, based on the assumption of three awards at \$150,000 each.
- 2) FNS staffing costs, which are identified below.

The cost of processing and reviewing the applications will cost \$16,083. This is based on an estimate of 29 hours of labor to process *each* application package. This labor estimate includes 2 hours by grants management staff to process an application, 24 hours total by 3 Agency staff to conduct a thorough technical review of each application, and 3 hours by the panel chairperson to document the technical reviews and prepare the recommendations for award. Assuming 10 applications will be received, it is anticipated that 290 hours will be needed to process and review these applications. The estimate also assumes an hourly cost per staff person of \$55.46 per hour (the average salary for GS-13 grade level including overhead and benefits). Costs other than salary costs are negligible.

Total hours:	290 hours
Total Annualized Cost to the Federal Government:	\$16,083

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is the first OMB submission for this program. This is a revision of a currently approved collection as a result of program changes FNS will add 1,548 burden hours to our inventory.

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

FNS will publicize summary information of the applicants that receive grant funding on the FNS website. www.fns.usda.gov

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.