

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

**Justification for Adding
Process and Technology Improvement Grants
List of Approved Programs Using Uniform Grant Application for
Non-Entitlement 0584-0512**

- 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.**

USDA's Food and Nutrition Service administers 15 nutrition assistance programs. In addition to the Supplemental Nutrition Assistance Program, these programs include Special Supplemental Nutrition Program for Women, Infants and Children, the National School Lunch Program, and the Summer Food Service Program which together comprise America's nutrition safety net.

SNAP Process and Technology Grants are three-year grants that have been awarded to State agencies, public health or educational entities; or private nonprofit entities on an annual basis since their inception in 2003. They have been identified for projects aimed at simplifying the Supplemental Nutrition Assistance Program (SNAP) application and eligibility determination systems or improving access to SNAP benefits by eligible households.

SNAP Process and Technology Improvement Grants are authorized under Public Law 113-79, section 11 (t). [7 U.S. C. 2020] – of the Food and Nutrition Act of 2008, as amended. A copy of Public Law 113-79 section 11. [7 U.S.C. 2020] is attached.

The purpose of this announcement is to describe the annual funding opportunity and solicit proposals to support SNAP Process and Technology Improvement Grant projects. In order to select the most appropriate grantees, a competitive request for applications is necessary. Eligible entities will prepare an application. Grant funds will be made available on a competitive basis, subject to availability of federal funds.

FNS will post the Request for Application (RFA) package for the SNAP Process and Technology Improvement Grants on or about April 9, 2015, on www.grants.gov, and on its website at <http://www.fns.usda.gov/snap/snap-program-improvement> .

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.

As in prior years, the primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The selection criteria are contained in the RFA package. This process will occur only once during fiscal year 2015 for this particular grant package.

In addition to the narrative application, the following grants.gov forms are required of grant applicants:

- Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF-424)
 2. Budget Information and Instruction (SF-424A)
 3. Assurance-Non-Construction Programs (SF-424B)

These forms are located at <http://www.grants.gov/web/grants/forms.html>.

- SF LLL (Disclosure of Lobbying Activities)

This form can be obtained at the following website:

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

- SF 425 (Federal Financial Reporting)

In addition, the applicant must submit the following Departmental Forms:

- **A Letter of Commitment** is required if the grant proposal is from a State agency working in partnership with another organization(s).
- **A Letter of Endorsement** is required if an applicant is not partnering with a State agency.

In lieu of submitting AD-1047 and 1048, users will adhere to the Terms and Conditions to follow these regulations.

- As a condition of award, selected applicants are required to comply with the requirements of 2 CFR Part 421: Requirements for Drug-Free Workplace (Financial Assistance).
- In addition, selected applicants are agree to ensure that all sub-recipients are neither excluded nor disqualified under the Suspension and Debarment rules found at 7 CFR sec. 3017.300 by doing any one of the following:
 1. Checking the System for Awards Management (SAM). This information can be found at www.sam.gov.
 2. Collecting a certification that the entity is neither excluded nor disqualified. Because a Federal certification form is no longer available, the Grantee or sub-Grantee electing this must devise its own.

3. Including a clause to this effect in the sub-recipient agreement and in any procurement contract expected to equal or exceed \$25,000, awarded by the Recipient or a sub-recipient within any agreements

- 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 the 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. All applicants will apply for this opportunity directly through www.grants.gov. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will report financial data using the SF 425 electronically through FNS' 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 purposes described in Question 2.**

There is no similar data collection effort available. This program solicitation is unique and the data collected is specific to this solicitation. 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.

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.

The information requested is held to the minimum amount required. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities since eligible applicants for this RFA is limited to State agencies, public health or educational entities and private nonprofit 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.

This will be an ongoing collection. The grants will be funded for the period September 30, 2015, through August 31, 2018. Once approved and before this collection expires in 2016, the program plans to work with Grant Management Division to ensure the remaining burden is account for the remaining award periods.

FNS will seek minimal information that will be critical in selecting the most promising grantees. This includes information of applicant's existing infrastructure and project design to perform program objectives. The consequence for not collecting the information is the inability to establish which proposal meets program objectives while adhering to grant evaluation criteria.

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.

A 60-day notice was published in the Federal Register on July 27, 2012, (Volume 77, Number 145, page 44210-44212) soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package.

FNS received one public comment in response to the Federal Register notice regarding where online details on FNS grant recipients, grant purpose, accomplishments and period of performance were located by requested by the writer. FNS prepared a written response to the commenting party.

FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings.

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

There are no plans to provide cash 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 application information requested is entirely voluntary. The collection of this information is for the purpose of aiding in the review of applications prior to grant award decisions and for management of grants. This information will be used within FNS and may 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 respect the existing policy with regard to privacy. FNS will work with the Grantee and ensure that any release of such information is done under the terms and conditions of the existing Freedom of

Information Act that requires the Grantee to release permission and is informed of the use of the information.

Grantees who are awarded a grant under this RFA will be required to submit the SF-425 forms. All of the SF-425 forms are stored in a secured database. Therefore, grant awardees must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business with the Food and Nutrition Service. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases.

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. 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.

B) 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 thirty (30) respondents will submit an application for the *SNAP Process and Technology Improvement Grants*. This is slightly higher than the average of 11-15 applications received in prior years, as FNS is conducting extensive outreach to eligible applicants for fiscal year 2015. It is estimated that the average applicant will spend 40 hours developing their proposal (this includes time for completing the required forms listed in question 2 above). This is based on prior experience of SNAP Process and Technology Improvement grant writers and the fact that applicants will have approximately 8 weeks to complete their proposals while also performing the normal duties of their jobs. The burden estimate includes time to submit the forms listed in question 2.

A.12.1 Estimate of Hours Burden on Respondents for Application

Eligible respondents includes all State Agencies, Local and Tribal (SLT) entites and Business-not-for-profit such as community-based or faith-based organizations, food banks, or other emergency feeding organizations. FNS estimates approximately 15 SLT entities and 15 private Business' not-for-profit will submit a proposal in response to this request for applications (RFA). The burden estimates are calculated below for the three years duration of the project period. The grants will be funded for the period September 30, 2015, through August 31, 2018

Pre-Award Burden

Affected Public	Estimated No. of Respondents	Frequency per Respondent	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Annual Estimated Burden Hours
State Agencies, Local and Tribal (SLT)	15	1	15	40	600
Business Private Non-Profit entities	15	1	15	40	600
Pre-Award Total Burden	30	1	30	40	1200

Pre-Award Reporting Burden Summary:

Number of Respondents: 30

Responses per respondent: 1

Total Annual Response: 30

Hours per Response: 40

Total Burden Hours: 1,200

Respondents have a full range of discretion in how they design and develop their proposal. FNS has provided guidance in the RFA on required items and on the evaluation criteria for proposals. Pre-Award hourly estimates identified above are used as the basis for determining total annual cost burden to respondents of the application.

The post-award burden hours are based on the production of quarterly progress reports that are submitted to FNS by the grantee selected for the project. Grant activities are expected to last for three years. In addition to the quarterly reports, the grantee will submit a final written report to FNS.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. It is estimated 11 grants (7 SLT agencies and 4 Businesses not for profit) will be awarded under this RFA. The total estimated burden is reflected in the following table:

A.12.2 Estimate of Hours Burden on Respondents for Application (Affected Public: State Agencies, Local and Tribal (SLT)) Post-Awardees Reporting Burden Estimates

Affected Public	Instrument	Number Respondents	Number Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
State Agencies, Local and Tribal (SLT)	Quarterly Progress Reports	7	4	28	2	56
	Final Program Reports	7	1	7	5	35
	SF-425 Financial Reporting (Quarterly)	7	4	28	1.50	42
	SF-425 Final Report	7	1	7	10	70
	Annual Total	7	10	70	2.9	203

A.12.3 Estimate of Hours Burden on Respondents for Application (Affected Public:

Business-not-for-profit) Post-Awardees Reporting Burden Estimates

Affected Public	Instrument	Number Respondents	Number Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Business Private Nonprofit Entities	Quarterly Progress Reports	4	4	16	2	32
	Final Program Reports	4	1	4	5	20
	SF-425 Financial Reporting (Quarterly)	4	4	16	1.50	24
	SF-425 Final Report	4	1	4	10	40
	Annual Total	4	10	40	2.9	116

Post Award Combined Reporting for SLT and Business Burden Summary

Number of Respondents: 11

Responses per respondent: 10

Total Annual Response: 110

Hours per Response: 2.9

Total Burden Hours: 343

Pre-and Post Award Combined Reporting for SA and Business Burden Summary:

Number of Respondents: 30

Responses per respondent: 4.6667

Total Annual Response: 140

Hours per Response: 10.85

Total Burden Hours: 1,519

GRAND TOTAL BURDEN ESTIMATES FOR REPORTING: 1,519 annual burden hours
= (pre-award 1,200 burden hours + post-award SLT 203 burden hours + post-award
Business 116 burden hours) and GRAND TOTAL ANNUAL RESPONSES FOR
REPORTING: 140 annual response (pre-award 30 responses + post-award SLT 70
responses + post-award Business 40 responses).

A.12.4 Post-Awardees Recordkeeping Burden Estimates Estimate of Hours Burden on Respondents for Application (Affected Public: State Agencies, Local and Tribal (SLT))

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cx)	(f) Hours Per Recordkeeper	(g) Total Burden (ex)
State Agencies, Local and Tribal (SLT)	RECORDKEEPING					
	SF-425 Final Report	7	1	7	0.05	0.35
	SF-424	7	1	7	0.05	0.35
	SF-424 B	7	1	7	0.07	0.49
	SF-LLL	7	1	7	0.11	0.77
	SF-425 Financial Reporting	7	4	28	0.1169	3.27
Post Award Recordkeeping Total Burden Estimates		7	8	56	.08	4.48

A.12.5 Post-Awardees Recordkeeping Burden Estimates Estimate of Hours Burden on Respondents for Application (Affected Public: Business Private Non-Profit entities)

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cx)	(f) Hours Per Recordkeeper	(g) Total Burden (ex)
Business Private Non-Profit entities	RECORDKEEPING					
	SF-425 Final Report	4	1	4	0.05	0.20
	SF-424	4	1	4	0.05	0.20
	SF-424 B	4	1	4	0.07	0.28
	SF-LLL	4	1	4	0.11	0.44
	SF-425 Financial Reporting	4	4	16	0.1169	1.87
Post Award Recordkeeping Total Burden Estimates		4	8	32	0.08	2.56

Post Award Recordkeeping for SLT Agencies and Business Burden Summary:

Number of Respondents: 11

Responses per respondent: 8

Total Annual Response: 88

Hours per Response: 0.08

Total Burden Hours: 7.04

FNS is requesting 4,578.12 annual burden hours (1,519 for reporting and 7.04 for recordkeeping) x three years =4,578.12). We also estimate an a total annual response of 228 X three years = 684. The overall reporting estimates 1526.04 this includes 1,200 burden hours for pre-award and 319 for post award reporting and 7.04 post award recordkeeping. The over all reporting for Business is 718.56 this includes 600 burden hours for pre-award, 116 for post-award reporting, and 2.56 post-award recordkeeping. The over all reporting for SLT is 807.48 this includes 600 burden hours for pre-award, 203 for post-award reporting, and 4.48 post-award recordkeeping. The total annual responses for Business reporting is 87 (15 for pre-award)+(40 for post-award) + (32 total annual responses for post award recordkeeping for Business). The total annual responses for SLT reporting is 141 (15 for pre-award)+ (70 for post-award) + (56 for total annual responses post award recordkeeping for SLT).

Recordkeeping burden is only associated with this collection after the grant has been awarded. There is no pre-award recordkeeping involved.

A.12.6 Estimates of Annualized Cost to Respondents for Application

The total estimated annual cost to respondents is \$98,197.88 (2,551.92 burden hours x \$38.48). FNS estimates that most respondents will utilize at least one full time member at a cost of \$38.68 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for Social Scientists and Related Workers, All Others - Occupation Code 19-3099 (according to the Bureau of Labor Statistics, Occupational Employment Wages, May 2014).

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 estimated pre-award cost to process and review the application awarded is \$41,778. This is based on an estimate of 30 hours of labor to process and review *each* application package.

The estimate assumes an hourly cost per staff person of \$46.42 per hour (the salary for GS-13 step 3 grade level including overhead and benefits). This labor estimate includes 2 hours by grants management and program staff to process an application, 20 hours total by 6 Federal employees to conduct a thorough technical review of each application, and 5 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award. It is estimated that 30 applications will be received, and thus 900 hours will be needed to process and review these applications. Pre-Award Federal labor costs will total \$41,778 (9,000 hours x \$46.42).

For each proposal anticipated to be awarded, Federal labor costs will total \$17,871.70. This is based on approximately 25 hours spent providing technical assistance and 10 hours reviewing the 9 program reports (progress reports (8) and final report (1)) for the grantee, for a total of 35 hours. (25 hours +10 hours= 35 hours x 11 grantees x \$46.42 per hour = \$1,494.50). Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2015, for a GS 13, Step 3 employee.

Total Annualized Pre-Award Cost to the Government	\$41,778
Total Annualized Post Award Cost to the Government	\$17,871.70
Total Annualized Cost to the Federal Government	\$50,649.70

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

There are no changes in the information collection since the last OMB approval.

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

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

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

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