

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

Justification for Adding

SNAP Recipient Integrity Information Technology Grants

List of Approved Programs Using Uniform Grant Application for

Non-Entitlement Discretionary Grants,

OMB Control Number 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.

The Food and Nutrition Act of 2008 authorizes funds to the U.S. Department of Agriculture Food and Nutrition Service (FNS) to provide grants on a competitive basis to State agencies. Up to \$7.5 million has been appropriated in FY 2015 for State agencies to prevent trafficking of Supplemental Nutrition Assistance Program (SNAP) benefits among SNAP recipients. The USDA Food & Nutrition Service (FNS) is charged with implementing this new competitive grant program and intends to solicit applications from States for the SNAP Recipient Integrity Information Technology Grant. In order to select the most appropriate grantees, a competitive request for applications is necessary. Eligible entities will prepare an application.

FNS will post the Request for Application (RFA) package for the *SNAP Recipient Integrity Information Technology Grants* on its website on after OMB clearance at <http://www.fns.usda.gov> and on www.grants.gov.

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.

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.

The following grants.gov forms are required of grant applicants. They are located at http://www.grants.gov/agencies/aforms_repository_information.jsp: Click Active Forms.

- Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF424)
 2. Budget Information and Instruction (SF-424A)
 3. Assurance-Non-Construction Programs (SF-424B)
 4. Federal Financial Reporting (SF-425)
- SF LLL (Disclosure of Lobbying Activities)

The required OMB form can be obtained at the following website:

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

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 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 submitted 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 new and unique. 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 solely administers the Supplemental Nutrition Assistance Program (SNAP). The information required for this grant program is not currently reported to State agencies on a regular basis in a standardized form.

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 are limited to State agencies that administer the Supplemental Nutrition Assistance Program.

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 is an ongoing grant initiative. FNS will seek minimal information that will be critical in selecting the most promising grantees. This includes information of applicant's existing infrastructure, information technology systems, and security policies to perform program objectives. The consequence for not collecting the information is the inability to establish which proposal meets program objectives while adhering to data privacy per the Food and Nutrition Act of 2008.

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 voluntarily. 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.

Eligible applicants (aka Respondents) for this RFA are limited to State agencies that administer the Supplemental Nutrition Assistance Program. FNS estimates that approximately ten (10) respondents will submit an application for the SNAP Recipient Integrity Information Technology Grants. It is estimated that the average applicant will spend 45 hours developing their proposal. This is based on the general estimate that applicants will have approximately nine (9) weeks to complete their proposals, averaging five (5) hours a week dedicated to this process.

A.12.1 Estimate Pre-Award Burden Hours on Respondents for Application

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
State & Local Agency	10	1	10	45	450
Pre-Award Reporting Total Burden	10	1	10	45	450

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.

In addition to the routine Standard Forms (SF), the post-award burden hours are based on the production of semi-annual progress reports and quarterly financial reports that are submitted to FNS by the grantee selected for the project.

Financial reports submitted use the SF-425. Grant activities are for three years. For the purposes of this estimate, the grantee will submit four (4) quarterly progress reports and four (4) financial reports each year. In addition, the grantee will submit a final written report.

The progress reports will ask for a description of the activities that took place during the previous period 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 period, 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, FNS assumes that awardees will spend two (2) hours in preparing quarterly reports and 1.50 burden hours per instance in financial reporting using the SF 425. The total burden to maintain the documents necessary to support the reports is approximately 2.24 burden hours for all SF forms. FNS assumes awardees will spend ten (10) hours preparing the final report. FNS estimates that up to three (3) grants will be awarded under this RFA. The total estimated burden is reflected in the following table:

A.12.2 Estimate Post-Award Burden Hours on Respondents for Application

(Affected Public: State and Local Agencies)

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	3	4	12	2	24
	SF-425 Financial Reporting (Quarterly)	3	4	12	1.50	18
	Final Written Report	3	1	3	10	30
	Post Award Reporting Annual Burden Total	3	9	27	2.66667	72

Pre-and Post-Award Reporting Burden Summary:

Number of Respondents: 10

Responses per respondent: 3.7

Total Annual Response: 37

Hours per Response: 14.11

Total Burden Hours: 522

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	(e) Est. Total Annual	(f) Hours Per Recordkeeper	(g) Total Burden
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			Per Respondent	Records (cxd)		(exf)
State Agencies, Local and Tribal (SLT)	RECORDKEEPING					
	SF-425 Final Report	3	1	3	0.05	0.15
	SF-424	3	1	3	0.05	0.15
	SF-424 B	3	1	3	0.07	0.21
	SF-LLL	3	1	3	0.11	0.33
	SF-425 Financial Reporting	3	4	12	0.1169	1.40
Post Award Recordkeeping Total Burden Estimates		3	8	24	0.09333	2.24

FNS is requesting 1,572.72 annual burden hours (524.24 for reporting and 2.24 for recordkeeping) x three years =1,572.72). We also estimate an a total annual response of 61 X three years = 183. The overall reporting estimates 524.24 this includes 450 burden hours for pre-award and 72 for post award reporting and 2.24 post award recordkeeping. The total annual responses is 61 (10 for pre-award)+(27 for post-award) + (24 total annual responses for post award recordkeeping).

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

A.12.3 Estimates of Annualized Cost to Respondents for Application

Affected Public	Type of Respondent	Number of Respondents	Average Time per Response (hours)	Frequency of Response	Hourly Wage Rate	Total Respondent Cost
State Agencies	State Agency	10	45	1	\$32.56	\$14,652.00
Total Burden		10	45	1	\$32.56	\$14,652.00

FNS estimates that most respondents will utilize at least one full time member at a cost of \$32.56 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 and Community Service Managers-Occupation Code 11-9151 (according to the Bureau of Labor Statistics, Occupational Employment Wages May 2014).

The total Pre-award costs were determined by adding the total number of applicants times the total number of hours times the total hourly costs or as follows: 10 (number of applicants) x 45 hours x \$32.56 = \$14,652.00

Pre-award costs are determined to total \$14,652.00. Pre-award costs are one-time only costs. Wage rates were determined using <http://www.bls.gov/bls/wages.htm> website.

Total Post-award costs for routine reporting are 84 hours x \$32.56 = \$2,735.04.

This amount is based on awarding up to three (3) grants. Post award costs are annual costs for the duration of the project (3 years).

- 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 applications are \$9,864.00. This is based on an estimate of 20 hours of labor to process and review *each* application package.

The estimate assumes an hourly cost per staff person of \$49.32 per hour (the average salary for GS-13 grade level including overhead and benefits). This labor estimate includes 2 hours by grants management and program staff to process an application, 15 hours total by 3

Federal employees to conduct a thorough technical review of each application, and 3 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award. It is estimated that 10 applications will be received, and thus 200 hours will be needed to process and review these applications.

For the 3 proposals anticipated to be awarded, Federal labor costs will total \$5,178.60. This is based on approximately 25 hours spent providing technical assistance and 10 hours reviewing the 9 program and financial reports for each grantee, for a total of 35 hours. (25 hours +10 hours= 35 hours X 3 grantees X \$49.32per hour = \$5,178.60). 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 5 employee.

Total Annualized Pre-Award Cost to the Government	\$9,864.00
Total Annualized Post Award Cost to the Government	\$5,178.60
Total Annualized Cost to the Federal Government	\$14,652.00

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.

FNS will publicize summary information of the applicant that receives grant funding at

<http://www.fns.usda.gov/>

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".

There are no exceptions to the certification statement.