

Supporting Statement for
Paperwork Reduction Act Submission
OMB No. 0584-0083

Operating Guidelines, Forms, and Waivers
Forms FNS-366A and FNS-366B, Program and Budget
Summary Statement

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Terms of Clearance

The agency is working closely with OMB for approval under the PRA of the Food Programs Reporting System (FPRS) as a reporting instrument. On April 5, 2013, the department published a 60 day notice (78 FR 20612) proposing this new collection.

A. Justification

1. 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 is a revision of a currently approved collection. Primarily, this information collection package consists of four major components of State agency reporting: (1) a budget projection statement, (2) a program activity report, (3) State plans of operation updates, and (4) other plans and submissions such as advance planning documents for information systems and for electronic benefit transfer (EBT) systems.

Budget Projection Statement, Program Activity Report, and State Plan of Operation Updates

Under section 16 of the Food & Nutrition Act of 2008 (the Act), 7 U.S.C. 2025, the Secretary is authorized to pay each State agency an amount equal to 50 percent of all administrative costs involved in each State agency's operation of the Supplemental Nutrition Assistance Program (SNAP). Under corresponding SNAP regulations at 7 CFR 272.2(c), the State agencies must submit annually to FNS for approval, a Budget Projection Statement (Form FNS-366A), which projects the total costs for major areas of SNAP operations, and a Program Activity Statement

(Form FNS-366B), which provides a summary of SNAP operations during the preceding fiscal year. The reports are required to substantiate the costs the State agency expects to incur during the next fiscal year. Form FNS-366A is submitted annually by August 15, for the upcoming fiscal year and Form FNS-366B must be submitted no later than 45 days after the end of each State agency's fiscal year.

In accordance with section 11(d) of the Act, 7 U.S.C. 2020, State agencies are also required to submit a Plan of Operation specifying the manner in which SNAP will be conducted within the State in every political subdivision. Section 11(e) of the Act provides that the State plan of operation shall provide for State agency verification of household eligibility prior to certification, completion of certification within 30 days of the filing of the application, fair hearings, submission of reports as required by the Secretary, and other provisions as may be required by regulations. Section 16(a) of the Act authorizes 50 percent Federal reimbursement for State agency costs to administer the program. Part 272.2(a) of SNAP regulations requires that State agencies plan and budget program operations and establish objectives for the next year. The basic components of the State Plan of Operation are the Federal/State Agreement, the Budget Projection Statement, and the Program Activity Statement (272.2(a)(2)). Under Part 272.2(c), the State agency shall submit to FNS for approval a Budget Projection Statement (which projects total Federal administrative costs for the upcoming fiscal year) and a Program Activity Statement (which provides program activity data for the preceding fiscal year). In addition, certain attachments to the plan as specified in subparagraphs (c) and (d) are to be submitted. As specified in subparagraph (f), State agencies only have to provide FNS with changes to these attachments as they occur. Consequently, these attachments are considered State plan updates.

FNS plans to develop and launch an electronic workflow system, SNAP Workflow Information Management (SWIM), to streamline FNS waiver processing, the current waiver request form will be transposed to an online waiver request form. The online version of the request form does not modify the currently approved burden hours in any way, but changes the method of collection for this information.

On January 29, 2010, FNS published a final rule (75 FR 4945) to amend 272.2(d) of the Food Stamp Program Regulations to require State agencies that opt to implement certain provisions of the Farm Security and Rural Investment Act of 2002 (FSRIA) to include these options in the State Plan of Operation. The optional provisions that must be included in the State Plan of Operations are: simplified definition of resources, simplified definition of income, optional child support deduction, homeless household shelter deduction, simplified reporting, simplified determination of deductions, and transitional benefits. The regulations at 7 CFR 272.2(f) require that State agencies only have to provide FNS with changes to these plans as they occur. FNS estimated a total of 40 burden hours to implement this provision.

Advance Planning Documents for Information Systems

Under Section 11(o) of the Act each State agency is required to develop and submit plans for the use of automated data processing (ADP) and information retrieval systems to administer SNAP. Section 16(a) of the Act authorizes partial Federal reimbursement of State costs for State ADP systems that the Secretary determines will assist meeting the requirements of the Act, meets conditions prescribed by the Secretary, are likely to provide more efficient and effective administration of the program, and are compatible with certain other Federally-funded systems. Under Section 277.18(c)(1) of the program regulations, State agencies must obtain prior written

approval from FNS when it plans to acquire ADP equipment with a total acquisition cost of \$5 million or more in Federal and State funds. The State agency must submit an Advance Planning Document (APD) prior to acquiring planning services and an Implementation APD prior to acquiring ADP equipment or services.

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.

Budget Projection: State agencies are required to submit to FNS for approval a Budget Projection Statement, Form FNS-366A, which includes projections of the total Federal costs for major areas of program operations. The budget projection allows FNS to estimate funding needs so we can fund the State administrative costs for the fiscal year.

Program Activity Statement: State agencies are required to submit to FNS a Program Activity Statement, Form FNS-366B, providing a summary of program activity for the State agency's operations during its preceding fiscal year. The activity report is required annually to substantiate the costs the State agency expects to incur during the next fiscal year. It provides data on the number of applications processed, number of fair hearings, and fraud control activity. FNS uses the data to monitor State agency activity levels and performance.

State Plan of Operation Updates: State agencies submit the operations planning documents to the appropriate regional office for approval. This information explains how States are operating

the program for monitoring purposes and allows FNS to know which States have implemented which activities and options for data and cost analysis purposes. State agencies administering SNAP may submit formal written requests, SNAP waiver requests, to obtain approval from FNS to deviate from a specific program rule or regulation. SNAP waiver requests fall into three broad categories based on statutory or regulatory authority.

Demonstration Waivers: Section 17(b) of the Act, 7 U.S.C. 2026(b), the Secretary may waive certain requirements of the Act to test program changes that might increase the efficiency of SNAP and improve the delivery of SNAP benefits to eligible households. Waivers of provisions of the Act are referred to as demonstration waivers.

Administrative Waivers: The FNS Administrator may authorize waivers to deviate from specific regulatory program requirements per 7 CFR 272.3(c) and 273.21(a). Waivers of the regulations are commonly called, “administrative waivers.” Administrative waivers are the most common waiver requested by States and approved by FNS.

Disaster Related Waivers/D-SNAP Waivers: Disaster assistance through SNAP is authorized by sections 402 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 USC 5121 et seq.) and the temporary emergency provisions contained in section 5 of the Act, and in 7 CFR 280 of the SNAP regulations.

Current procedures require that in order for FNS to approve a SNAP waiver request, the State agency must submit the SNAP Waiver Request Form. With the development of SWIM, an

electronic workflow system to streamline FNS waiver processing, the current waiver request form will be converted to an online waiver request form. Waivers have always been included in the State Plan of Operations.

Advance Planning Documents: The Advance Planning Documents (APD) for State automated data processing and information systems are useful to FNS because they explain how the system will work and help explain the estimated cost of the system. The testing plan itself does not require approval. However, it must be submitted so that FNS can make a sound determination as to the validity of the test results and the State's decision to proceed to pilot, which does require FNS concurrence. The information allows FNS to determine whether the system meets the statutory criteria for approval for Federal reimbursement.

Financial Reporting: FNS requires State agencies to report expenditures for administrative costs and cash-out benefit costs using SF-425 in conjunction with the FNS 366-A which requests Federal funding. A copy is maintained for 3 years.

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 makes every effort to comply with E-Government Act, 2002 (E-Gov) and to provide for

alternative submission of information collections.

Currently, States submit electronic FNS-366A, FNS-366B, and SF-425 reports via the Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>. Because budgets come in before and for the upcoming fiscal year while program activity reports come in after the completed fiscal year, the time frames for the two reports in this submission are different by necessity. In fiscal year (FY) 2012, 100% of these responses were reported electronically.

FNS plans to develop and launch an electronic workflow system, SNAP Workflow Information Management (SWIM), to streamline FNS waiver processing, the current waiver request form will be transposed to an online waiver request form. FNS estimates that 100% of waiver requests will be submitted electronically, beginning in fiscal year (FY) 2014.

Currently, States submit the request for administrative review of ADPs via electronic mail. This request is an official memorandum, signed and provided by the requestor in portable document format (PDF). In fiscal year (FY) 2012, 100% of these plans were submitted via email.

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.

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 monitors State performance to ensure that the program is being efficiently and economically operated.

The FNS-366A, which includes projections of the total Federal costs for major areas of program operations, is submitted prior to the start of the fiscal year and is necessary as part of the budget approval process. State agencies report actual cost data to FNS after the fact; actual cost data is not duplicative of the data collected on the FNS-366A.

In order to eliminate duplication on APDs, FNS works closely with the Department of Health and Human Services on integrated systems affecting both Departments. The State agency submits the same documentation to each Department concurrently. Coordination of decisions and responses to State requests for approval are executed between the two Departments routinely.

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. No small entities are impacted by this collection of information.

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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.

Form FNS-366A is submitted annually by August 15 for the upcoming fiscal year and Form FNS-366B is submitted no later than 45 days after the end of each State agency's fiscal year. Less frequent reporting would disrupt budget planning and delay appropriation distributions. State Plans of Operation are a one-time effort with updates provided as necessary.

The frequency of the APD requirement is at the discretion of respondents and their need to apply for Federal Financial Participation for the cost of their ADP equipment and services acquisition. These documents allow FNS to determine whether the system meets the statutory criteria for approval for Federal reimbursement. Without these documents FNS would not be able to verify and ensure State compliance with statutory 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 that require the information to be collected 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), 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.

On July 2, 2013 FNS published in the Federal Register a 60-day notice 78 FR 39704 regarding this information collection. Comments were solicited on this information collection as part of the comment period of the notice. FNS received no 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 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.

Consultation with users of the FNS-366A, FNS-366B, and State Plan of Operations has been a continuous process over the years. Consultations on the new SWIM system were conducted on the following dates:

- May 13, 2013 - SWIM Overview for SNAP Midwest Regional Office Director and Managers
- May 20, 2013 - SWIM Overview Webinar for SNAP National Office and Regional Office Staff
- May 29, 2013 - SWIM Overview Webinar for SNAP National Office and Regional Office Staff

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

FNS has 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.

Agency complies with the Privacy Act of 1974.

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 included in this submission.

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.

The burden consists of four major components. It covers the FNS-366A, the FNS-366B, the State plan of operation updates submitted as attachments to the FNS-366B, and other Advance Planning Documents (APD) and update submissions. The estimated total annual burden for this collection is 2,866 hours (2,828 reporting hours and 38 recordkeeping hours). The calculation of the burden for each of these components is described below:

Reporting:

FNS-366A. Fifty-three (53) State Agencies (SA) submit 1 response annually for a total of 53 annual responses. The annual burden for the FNS-366A is 689 hours. Form FNS-366A provides an estimate of the funding needed to operate the program. The reporting burden is estimated to be 13.00 hours annually per respondent (53SA x 1 annual report= 53 total annual responses x 13 hours per response = 689).

FNS-366B. Fifty-three (53) SA submit 1 response annually for a total of 53 annual responses. The annual reporting burden for the FNS-366B report is 17.93 hours per respondent to complete the form. The reporting burden for the FNS-366B alone is 950.29 hours (53SA x 1 annual report= 53 total annual responses x 17.93 hours per response= 950.29).

Plan of Operation Updates. Fifty-three (53) SA submit 1 response annually for a total of 53

annual responses. The reporting burden for submission of updates to State Plans of Operation as attachments to the FNS-366B is 6.58 hours per respondent, resulting in estimated burden hours of 348.99 (53 SA x 1 annual report = 53 total annual response x 6.5847 hours per report = 348.99). The SNAP Waiver Request Form is included as part of the total reporting burden for State Plan of Operation Updates. Approximately 45 SA will submit 3.94 SNAP Waiver Requests annually for a total of 177 responses (45 SA x 3.94 annual waiver request = 177.3 total annual waiver request). The estimated average number of burden hours per submission is 1 hour resulting in estimated total burden hours of 177.3 for the waiver requests. The total reporting burden for the State Plan of Operation updates is 526.29 hours (348.99 + 177.3 = 526.29).

Other Plans and Submissions. We estimate that up to 53 State agencies may submit an average of five (5) APD, plan, or update submission for a total of 265 annual responses at an average estimate of 2.5 hours per respondent. The reporting burden is 662.5 hours (53 SA x 5 annual ADPs = 265 total annual plans/updates x 2.5 hours per plan/update = 662.5)

Financial Reporting. FNS requires State agencies to report expenditures for administrative costs and cash-out benefit costs using SF-425 in conjunction with the FNS 366-A which requests Federal funding. FNS estimates that 53 State agencies will submit 1 report quarterly, the total annual responses is 212 and the estimated burden per response is 1.50 hours for a total reporting burden of 318 hours annually. (The current burden estimates for SF 425 and cost associated to the respondents are approved under [OMB Control Number 0584-0512], and the estimates are no longer included as part of this FNS collection.)

The agency has published a 60day Federal Register Notice (FRN) and submitted an information collection request package which discusses our plans to use FPRS as a reporting instrument that will take the place of SF 425 for required burden crossing various programs.

Table A. 12.1 Reporting Estimates of Hour Burden

AFFECTED PUBLIC	FORMS	NUMBER OF RESPONDENTS	FREQUENCY OF RESPONSE	TOTAL ANNUAL RESPONSES	TIME PER RESPONSE (HRS)	ANNUAL REPORTING BURDEN HOURS
State Agencies	FNS-366A	53	1	53	13.00	689.00
	FNS-366B	53	1	53	17.93	950.29
	Plan of Operation Updates (366B)	53	1	53	6.58	348.99
	Plan of Operation Updates (Waivers)	45	3.94	177.3	1.00	177.30
	Other APD Plan or Update	53	5	265	2.5	662.5
	Total Burden Estimates		-	-	601	-

Recordkeeping:

FNS-366A. There is a total number of 53 recordkeepers for each activity. Each State agency submits 1 response annually for a total of 53 annual responses. A copy is maintained for 3 years. It takes approximately 0.05 minutes to maintain each record. Total annual recordkeeping burden for FNS-366A is estimated at 2.65 hours annually per recordkeeper (53 SA x 1 annual response = 53 total annual responses x .05 hours per response = 2.65).

FNS-366B. Each State agency submits 1 response annually for a total of 53 annual responses;

each record takes approximately 0.05 minutes to maintain. The annual recordkeeping burden for FNS-366B is estimated annually at 2.65 hours per recordkeeper (53 SA x 1 annual response = 53 total annual response x .05 hours per response = 2.65).

Plan of Operation Updates. Each State agency submits 1 response annually for a total of 53 annual responses; each record takes approximately 0.07 minutes to maintain. The annual recordkeeping burden for updates to State Plans of Operation as attachments to the FNS-366B is 3.71 hours per recordkeeper (53SA x 1 annual response = 53 total annual responses x .07 hours per response= 3.71).

Other Plans and Submissions. FNS estimates that up to 53 State agencies may submit an average of 5 APD, Plan, or Update submissions (approximately 265 records) at an average estimate of .11 minutes per record keeper for an estimated total of 29.15 recordkeeping burden for this activity hours (53SA x 5 annual ADP plans/updates = 265 total annual ADP plans/update x .11 hours per response = 29.15).

Financial Reporting. The annual recordkeeping burden for financial reporting is estimated at 4,353 hours for 53 recordkeepers at approximately 212 records per State Agencies submitted quarterly. A copy is maintained for 3 years. (The current recordkeeping burden estimates for the SF-425 and cost associated to the respondents fare currently approved under [OMB Control Number 0584-0512], and the estimates are no longer included as part of this FNS collection.

Table A. 12.2 Record Keeping Burden

(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cxd)	(f) Hours Per Recordkeeper	(g) Total Burden (exf)
RECORDKEEPING					
FNS-366A	53.00	1.00	53.00	0.05	2.65
FNS-366B	53.00	1.00	53.00	0.05	2.65
Plan of Operations	53.00	1.00	53.00	0.07	3.71
Other APD Plan or Update	53.00	5.00	265	0.11	29.15
	53.00	-	424	-	38.16

Table A. 12.3 Reporting and Record Keeping Burden Summary

AFFECTED PUBLIC	FORMS OR ACTIVITIES	NUMBER OF RESPONDENTS	ANNUAL FREQUENCY OF RESPONSE	TOTAL ANNUAL RESPONSES	TIME PER RESPONSE (HRS)	ANNUAL REPORTING BURDEN HOURS
State Agencies Reporting	FNS-366A, FNS-366 B, Plan of Operation Updates (366B), Plan of Operation Updates (Waivers), Other APD Plan or Update	53	11.339622	601.00	4.7056239	2,828.08
State Agencies Recordkeeping		53	8.00	424.00	0.09	38.16
GRAND Total Reporting and Recordkeepin g Burden Estimates		53	-	1,025.00	-	2,866.24

B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The estimate of respondent cost is based on the burden estimates developed in 12(a) above.

Based on the Bureau of Labor Statistics May 2012 Occupational and Wage Statistics – 13-0231 (<http://www.bls.gov/oes/current/oes132031.htm>), hourly mean wage for budget analyst functions performed by State and local agency staff are valued at \$34.35 per staff hour. Annual respondent cost is estimated at \$95,455.

Table A. 12.3 Reporting and Recordkeeping Annualized Cost to Respondents

TYPE OF RESPONDENTS	TYPE OF SURVEY INSTRUMENTS	REPORTING AND RECORDKEEPING BURDEN	HOURLY WAGE RATE	RESPONDENT COST – PRIOR TO FEDERAL COST SHARING
State Agency	FNS-366A	691.65	\$34.35	\$23,758
Staff	FNS-366B	952.94	\$34.35	\$32,733
	Plan of Operation	530	\$34.35	\$18,206
	Other APD Plan or Update	691.65	\$34.35	\$23,758
Total		2,866.24	\$34.35	\$98,455

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 and/or annualized maintenance costs associated with this burden.

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.

Table A. 14.1 Annualized Costs to Government

ACTIVITY	HOURS REVIEWING AND MONITORING	COST PER HOUR	COSTS REVIEWING AND MONITORING	AUTMOATED SYSTEM COSTS	FEDERAL SHARE OF STATE COSTS	TOTAL FEDERAL COSTS
FNS-366A	424	\$37.37	\$15,845	\$529,277	\$11,879	\$557,001
FNS-366B	106	\$37.37	\$3,961	\$39,240	\$16,367	\$59,568
Plan of Operation	477	\$37.37	\$17,825	\$0	\$9,103	\$26,928
Other APD Plan or Update	2,618	\$37.37	\$97,835	\$0	\$9503.5	\$107,339
Total	3,625	\$37.37	\$135,466	\$568,517	\$46,853	\$750,836

The annual cost to the Federal Government using the 2012 Federal Salary Wage Table for two Management Analysts, GS 12, Step 5 to collect and use the data is estimated at \$37.37 an hour. In addition to the wage data the annualized cost to the Federal Government also includes (1) reviewing, approving, and tracking State administrative budgets and disbursing funds; (2) reviewing and approving State plans and automated system project planning documents; (3) data entry and retrieval; (4) automated system costs; and (5) the Federal share of State agencies' burden costs to report the data. Total cost to the Federal Government is \$750,836.

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

This is a revision of a currently approved collection. The revised burden estimates have decreased from 7,577 to 2,866 hours, for an overall reduction of -4,711 burden hours for reporting and recordkeeping. The reason for the decrease is due program changes for the removal of the estimated burden hours for (-4,711) financial reporting via SF-425, which are approved and maintained in the *Uniform Grant Application for Non-Entitlement Discretionary*

Grants, OMB Control No.: 0584-0512; Expiration date: 1/31/2016.

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

This data is included in the annual SNAP State Activity Report that is produced for and used by FNS for analysis and evaluation purposes. The report also published on the USDA FNS website at <http://www.fns.usda.gov/pd/snapmain.htm>. The report is usually published in the first quarter of the calendar year.

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.