

Supporting Statement for Paperwork

Reduction Act Submission

OMB No. 0584-0080

Issuance Reconciliation Report, Form FNS-46

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FNS plans to adhere to the previous terms of clearance which remains in effect to display the expiration date on all electronic versions of this form. Since we have adhered to the terms of clearance during the last two renewals, we believe the term of clearance is no longer necessary.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This is an extension of a currently approved collection. Section 7(d) of the Food and Nutrition Act of 2008, as amended, (the Act) (7 U.S.C. 2016 (d)), requires State agencies to report on their SNAP benefit issuance operations not less than monthly. Section 11(a) of the Act (7 U.S.C. 2020(a)) requires State agencies to assume responsibility for the issuance, control and accountability of SNAP benefits.

Regulations at 7 CFR 274.4 (a) and 274.4(b)(2) require State agencies to account for all issuance through the reconciliation process and to submit a report on this process using Form FNS-46, Issuance Reconciliation Report. These reports must be submitted to the Food and Nutrition Service (FNS) monthly and must reach FNS no later than 90 days following the end of each

report month. The FNS-46 report reflects the total issuance, returns and unauthorized issuance amounts resulting in the net Federal obligation.

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 Food and Nutrition Act of 2008, and in 7 CFR Part 280 of the SNAP regulations. In accordance with 7 CFR 274.4, State agencies shall report SNAP participation and issuance totals to FNS. There are no recordkeeping requirements outside the normal business routine for State agencies.

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.

State welfare agencies (or county welfare agencies under the oversight of the State) certify eligibility of SNAP applicants and provide benefits to households. FNS oversees the operation of State welfare agencies to ensure compliance with Federal law and regulations. States issue the benefits using various systems and report monthly issuance amounts to FNS by completing electronic FNS-46 reports.

The FNS-46 report is a program management report which is used on an ongoing basis to document the reconciliation process by which State agencies compare all issuances, including Disaster SNAP (D-SNAP) benefits made during the month to the record for issuance. The

record-for-issuance is then compared with the master issuance file. Findings from this comparison shall be reported on the Form FNS-46.

The FNS-46 is also used as a management tool used for the analysis of other problems in the issuance of Program benefits that are not liabilities of the State agency but are indicators of administrative problems. The FNS-46 report also enables State agencies to identify other acts of fraud and/or waste so that corrective action can be taken. The data from the FNS-46 report is also used for reports to Congress, to establish State issuance liabilities, and to determine national performance measures for Quality Control.

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 the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collection. The collection of information is performed at the State and county levels. State agencies have the authority to use information technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and individual reporting requirements contained in this submission. As of June 2007, 100 percent of the respondents submitted the FNS-46 data electronically in the Food Program Reporting System (FPRS) at <https://www.fprs.fns.usda.gov>.

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 available. FNS solely monitors issuance of SNAP benefits. The information required for FNS-46 is not currently reported to any other entity outside of FNS. 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, describe any methods used to minimize burden.

This information collection does not adversely impact small business or other small entities. Information collected is limited to what is necessary to comply with statutory provisions and to protect program integrity without imposing undue burden on respondents. All 54 State agencies deliver the same program benefits and perform the same function regardless of population size. Thus, they maintain the same kinds of information on file and of these respondents none are small 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 is a on-going information collection. Reporting points are required to complete and submit Form FNS-46 on a monthly basis within 90 days from the end of the report month. We expect a 100 percent response rate. Failure to respond constitutes a violation of program regulations and the Act for which State agencies may be sanctioned. Only a change to legislation would authorize less frequent reporting.

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 information collection to be conducted 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, 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.

A 60-day notice was published in the Federal Register on September 17, 2013 at 78 FR 57127.

No public comments were received in response to this notice.

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.

FNS consulted with Regional Offices and State agencies to ascertain the estimated amount of administrative staff time that is needed each month to perform the information collection functions.

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

We do not provide any payment or gifts to the respondents for their submission of data or information collection.

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

The Department will comply with the Privacy Act of 1974. Section 11 (e)(8) of the Act mandates that each State agency provide safeguards which limit the use or disclosure of the administration or enforcement of the provisions of the Act, regulations issued pursuant to the Act, federal assistance programs, or federally assisted State programs. The information collected by the State agency to be reported on Form FNS-46 does not identify participants by name.

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.

Burden estimates associated with Form FNS-46 are based on the number of reporting points (54 State agencies). Respondents submit Form FNS-46 monthly (12 times per year). This submission is based on the average monthly reporting unit burden estimates of 4 hours, per respondent, derived from consultation with regional and State agency personnel. Thus, the estimated burden is 2,592 hours annually for all respondents.

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.

Burden estimates associated with the FNS-46 report are determined from information maintained in FPRS and are based on the number of respondents. As of Fiscal Year (FY) 2013, there were 54 respondents. Of this number, 53 States agencies have one reporting point; however, New York has two reporting points (Upstate NY counties and New York City). Each reporting point in New York submitted the FNS-46 report differently. As a result of the two different reporting methods used by the State and city, New York is counted twice, resulting in a total of 54 respondents. There are no recordkeeping requirements imposed on the respondents for this information collection request.

Based on this information, the estimated annual burden is as follows:

Affected Public	(a) Description of Collection Activity	(b) Form Number	(c) No. Respondents	(d) No. Responses Per Respondent	(e) Total Annual Responses (cxd)	(f) Hours Per Response	(g) Total Burden (exf)
Reporting							
State Agency	Issuance Reconciliation Report	FNS-46	54	12.00	648.00	4.00	2,592.00
Total Burden Requested			54	12.00	648.00	4.00	2,592.00

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 2012 Bureau of Labor Statistics hourly mean wage for State government social and human service assistance, found at <http://www.bls.gov/oes/current/oes211093.htm>. Functions performed by State and local agency staff for reporting valued at \$17.89 per staff hour. The estimated annualized cost to respondent (with 50 percent reimbursement from Federal government is 2,592 hours x \$17.89 per hour = \$46,370.88, less the 50% Federal reimbursement rate, for an estimated annual cost to the public of \$23,185.44.

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.

The total annualized cost to the Federal Government is estimated at \$24,178.71. We estimated that federal employees Program Analyst receiving an average General Schedule (GS) grade 12 step 6 wage based on the Washington DC-Northern Virginia locality area will spend approximately 20 hours to draft this information collection for OMB approval: $\$41.85 \times 20 = \837 a year and a Branch Chief at the GS 14 Step 2 will spend approximately 3 hours to review and approval information collection request: $\$52.09 \times 3 = \156.27 a year.

Additionally, other Federal costs is equal the amount of Federal Financial Participation for SNAP administrative costs paid to State agencies for this work. The reimbursement rate is 50 percent of the State agency costs. The total annual burden hours = $2,592 \times \$17.89$ per hour = $\$46,370.88$ less the 50 percent Federal reimbursement rate, for an estimated annual cost to the Federal Government of $\$23,185.44$ ($\$46,370.88 \times 50$ percent). No other Federal costs are anticipated.

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

This is an extension of a currently approved collection. The estimated total annual burden hours associated with this ICR is 2,592 hours remains unchanged from the last approval. However, as a result of program changes elements for the FNS-46 have been modified. Updates the FNS-46 includes separate reporting of D-SNAP benefit issuance and participation which will ensure estimates are available on a monthly basis for timely response to Federal, State, and other inquiries. Requiring monthly D-SNAP estimates on the FNS-46 will not duplicate any data collection currently in place.

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 collection of information.

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.

FNS is not seeking approval to omit the expiration date of OMB approval on the FNS-46.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to this certification statement.

