

SUPPORTING STATEMENT

**REPORT OF COMMODITY DISTRIBUTION FOR DISASTER RELIEF (FNS-292-A) AND
REPORT OF DISASTER SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM BENEFIT
ISSUANCE (FNS-292-A AND FNS-292-B)
RECORDKEEPING BURDEN ONLY**

OMB No. 0584-0037

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A. JUSTIFICATION

A.1. Circumstances Making the Collection of Information Necessary.

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 a revision of a currently approved collection. The reporting aspect of this collection was transferred, approved and currently maintained in OMB Control No: 0584-0594, Expiration date: 6/2017; Title: Food Programs Reporting System (FPRS). In this request, FNS is seeking approval for the recordkeeping burden required to maintain Form FNS-292-A and FNS-292-B.

Food Distribution in disaster situations is authorized under Section 32 of the Act of August 24, 1935 (7 U.S.C. 612c), as amended; Section 416 of the Food and Agriculture Act of 1949 (7 U.S.C. 1431), as amended; Section 709 of the Food and Agriculture Act of 1965 (7 U.S.C. 1446a-1), as amended; Section 4(a) of the Agriculture and Consumer Protection Act of 1973 (7 U.S.C. 612c note), as amended; and by Sections 412 and 413 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5179, 5180). Surplus foods are made available by State distributing agencies for relief purposes to victims of natural disasters such as hurricanes, floods, tornadoes, etc. Participating local organizations use surplus foods for both central feeding operations and for distribution to families in homes cut off from normal sources of food supply. Program implementing regulations are contained in 7 CFR Part 250 and include reporting requirements for foods provided for disaster relief purposes. Form FNS-292-A will be used in accordance with 7 CFR 250.69(f) by

State distributing agencies to provide a summary report to the agency within 45 days following termination of the disaster assistance.

Disaster assistance through the Supplemental Nutrition Assistance Program (SNAP) is authorized by sections 402 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 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. The Food and Nutrition Service (FNS) initiate this program in a SNAP project area when all or part of the area has been affected by a disaster. In accordance with 7 CFR 274.4, State agencies shall keep records and report SNAP participation and issuance totals to FNS. Form 292-B will be used by State welfare departments to report to FNS the number of households and persons who were certified for the Disaster SNAP, and also to report the value of benefits issued to those households.

A.2. Purpose and Use of the Information.

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.

Information collected on Form 292-A and 292-B will be used by the FNS Administrator, the Food Distribution Division, and the three SNAP divisions to monitor program activity, assess coverage provided to needy recipients, assure the validity of requested commodity reimbursements and to prepare budget requests. Data from Form 292-A and 292-B has been used in the past to report to the Secretary of Agriculture, the Federal Emergency Management Agency, the White House and Congress on FNS disaster relief efforts.

Agencies will collect information using an electronic version of Form 292-A and 292-B that can be submitted using the Food Programs Reporting System (FPRS). All State agencies have the technological capacity to support electronic submissions. State education and welfare agencies that administer FNS nutrition assistance programs will provide the information which is collected only once per disaster per State. The frequency of collection and the recordkeeping procedures have not changed since the previous collection was approved. As mentioned, the reporting burdens are now accounted in OMB Control Number: 0584-0594.

A.3. Use of Information Technology and Burden Reduction.

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 accordance with the E-Government Act of 2002 (E-Gov), FNS has reviewed the process for collecting information via Form 292-A and 292-B and will provide electronic submission of these forms with an alternative for paper submission, if needed.

All the reporting burden requirements are maintained in the FNS 292-A and 292-B located in the Food Programs Reporting System (FPRS). The form will be available to and maintained by all 55 State Agencies. The form for the reporting burden is available in the FPRS web-based application found at <https://fprs.fns.usda.gov>. FNS anticipates 100 percent of our responses will be submitted

electronically. This format allows all State agencies to access forms quickly, report on specific disaster relief activities in detail, and submit the forms directly to FNS as required.

A.4. Efforts to Identify Duplication and Use of Similar Information.

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 information available. The information required for Forms FNS-292-A and FNS 292-B is not currently reported or maintained in 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.

A.5. Impacts on Small Businesses or Other Small Entities.

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

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Information being requested or required has been held to the minimum required for the intended use. Circumstances limit the flexibility in modifying the reporting and recordkeeping requirements. Although smaller State agencies are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other State agency. Thus, they maintain the same kinds of information on file. There are no small entities associated with this information collection.

A.6. Consequences of Collecting the Information Less Frequently.

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 data collection. The reporting of data is done only “on occasion” after a disaster situation has occurred and these records are maintained by the State Agencies. However, if information collection was not collected in the period following each disaster program, FNS would be unable to monitor the issuance of SNAP benefits and the distribution of surplus foods during disaster situations, ensure integrity and reimburse States appropriately for their disaster relief efforts. In addition, FNS would be unable to respond to White House, Congressional, and outside requests to accurately quantify disaster relief provided by FNS.

If the information were not collected, FNS would be unable to monitor the issuance of SNAP benefits and the distribution of surplus foods during disaster situations. In addition, it would not have the information to respond to requests from multiple agencies on FNS contributions to Federal disaster relief efforts.

A.7. Explain any Special Circumstances that Would Cause an Information Collection to be Conducted in a Manner that is Inconsistent with 5 CFR 1320.5.

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.

A.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).

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.

The FNS notice was published in the Federal Register on March 27, 2014, Volume 79, Number 59, Page 17130 and 17131 (included with this submission). The Department received one comment from a client in response to the notice. The original comment and FNS response are included with this submission.

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.

Form 292-A and 292-B have been in use for six years. During that time, FNS National and Regional Offices have worked closely with State agencies in coordinating disaster response efforts and FNS has not received information from affected State agencies that necessitate a change to the data collection instrument or the frequency of collection.

A.9. Explanation of any Payment or Gift to Respondents.

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

There are no plans to provide any payments or gifts to respondents.

A.10. Describe any Assurance of Confidentiality Provided to Respondents and the Basis for the Assurance in Statute, Regulation, or Agency Policy.

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

FNS does not offer any assurance of confidentiality to the respondents.

A.11. Justification for Sensitive Questions.

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.

Form 292-A and 292-B contain no questions of a sensitive nature.

A.12. Estimates of Recordkeeping Hour Burden Including Annualized Hourly Costs.

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.***
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.***

There is no reporting burden hours associated with this information collection. The annual reporting burden has been removed and transferred to OMB Control No: 0584-0594. The information collection for the Food Programs Reporting System (FPRS) now reflects the previous reporting burden and responses from this collection.

The estimated total annual recordkeeping burden of this collection is 550 minutes (9 hours) for 55 State Agencies to maintain these records annually.

Record Keeping Burden:

The data provided on Form 292-A and 292-B is part of State agency records maintained for overall commodity food distribution and SNAP administration. The overall burden estimates for recordkeeping burden for the State agencies is estimated to be 5 minutes (.084 hours) per part (292-A and 292-B) per respondent (total of 10 minutes (.167 hours) per respondent). The estimated total annual responses remain unchanged. There was an error we planned to address since the FPRS transfer, it is no longer necessary. Those annual responses for reporting are now in that information

collection.

TABLE A.12.2 – Estimates of Record Keeping Burden

Description of Record Keeping Activity	Form Number	Number of Record Keepers	Frequency of Response	Estimated Total Annual Responses	Annual Hours per Record Keeper	Total Annual Record Keeping Hours
Commodity Distribution	292-A	55	1	55	.084	4.62
SNAP Benefit Issuance	292-B	55	1	55	.084	4.62
Totals		55		110		9.24

Annualized Cost to Respondents:

Respondents and record keepers involved in this collection will be managers at State Departments of Social Services, which corresponds to the Bureau of Labor Statistics Category 11-9151, Social and Community Service Managers. Based on the most recent Occupational Employment and Wage Estimates from May 2013, workers in this category employed by State Governments earn an hourly mean wage of \$32.37.

TABLE A.12.3 – Estimates of Annual Costs to Respondents

Type of Respondents	Form Number	Number of Respondents	Frequency of Response	Average Time per Response	Hourly Wage Rate	Respondent Cost
Commodity Distribution	292-A	55	1	.084	\$32.37	\$149.55
SNAP Benefit Issuance	292-B	55	1	.084	\$32.37	\$149.55
Totals	-----	55				\$299.10

A.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.

A.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 Federal cost has been developed by estimating the various costs involved in Form 292-A and 292-B. The ongoing costs to the Federal government related to this collection are primarily employee labor costs. Federal government employees will review and evaluate the data submitted by the State agencies.

Estimate of Annualized Cost to the Federal Government

Employee labor for analyzing, evaluating, and summarizing information from this collection:

292-A

1 Full-time Employee @ GS-12	= \$75,621 annually / 52 weeks
	= \$1,454.25 / 40 hours
	= \$36.36 hourly wage rate
15 minutes per response x 55 responses annually	= 825 minutes / 60

= 13.75 hours annually

\$36.36 x 13.75

= **\$499.95 annual cost**

292-B

1 Full-time Employee @ GS-13

= \$89,924 annually / 52 weeks

= \$1,729.31 / 40 hours

= \$43.23 hourly wage rage

15 minutes per response x 55 responses annually

= 825 minutes / 60

= 13.75 hours annually

\$42.80 x 13.75

= **\$594.41 annual cost**

TOTAL ANNUAL EMPLOYEE LABOR COST

= **\$1,094.36 (\$499.95 + \$594.41)**

TOTAL 3-YEAR EMPLOYEE LABOR COST

= **\$3,283.08 (\$1,094.36 x 3)**

TOTAL ANNUAL COST TO FEDERAL GOVERNMENT = \$1,094.36

TOTAL 3-YEAR COST TO FEDERAL GOVERNMENT = \$3,283.08

A.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 current burden inventory for this information collect is 92 burden hours. This request reflects an overall decrease of -83 burden hours (-46 reporting burden hours). This decrease reflects program changes with the annual reporting burden which was transferred to OMB Control No: 0584-0594. Additionally, there is a decrease of -37 hours for recordkeeping burden hours due to

adjustments.

The adjustments to the recordkeeping burden estimates were adjusted due to over estimating the recordkeeping time per respondent. The currently approved estimates erred in estimating 25 minutes per form per respondent for recordkeeping, which resulted in a larger number of approved burden hours (46 hours) than was appropriate for this collection. This adjustment reflects a more accurate estimate of 5 minute responses per respondent which decreased from 46 burden hours to 9 hours burden hours for State agencies maintaining records of this information.

In addition, there is a significant adjustment in the annualized cost to the Federal government. The previously approved collection included the costs associated with the FPRS contract. The costs associated with the contractor have been removed due to the elimination of the reporting burden for this information collection. This collection now properly accounts for these reductions.

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

The information collected is published annually on the “Disaster Assistance” page of the FNS website: <http://www.fns.usda.gov/disasters/disaster.htm>. The information collection does not employ statistical methods.

A.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 print the expiration date of OMB approval on Form 292-A and 292-B.

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

There are no exceptions to the certification statement.