

**SUPPORTING STATEMENT FOR
“SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND TRAINING
PROGRAM ACTIVITY REPORT (FNS-583)”**

OMB No. 0584-0339

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Contents

Part A. Justification.....	4
A. 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.....	4
A. 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.....	4
A. 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.....	5
A. 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.....	5
A. 5 If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.....	6
A. 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.....	6
A. 7 Explain any special circumstances that would cause an information collection to be conducted in a specific manners, as outlined:.....	7
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, 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.....	7
A. 9 Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.....	8
A. 10 Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.....	8
A. 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.....	8
A. 12 Provide estimates of the hour burden of the collection of information.....	8
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.....	13
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.....	13
A. 15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.....	14
A. 16 For collections of information whose results are planned to be published, outline plans for tabulation and publication.....	15

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.....15

A. 18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act.".....15

List of Attachments.....18

Terms of Clearance:

Food and Nutrition Service (FNS) has adhered to the previous terms of clearance outlined in the June 4, 2013 approval of the current collection whereas the instrument contained in the collection (FNS-583) was approved for one year. OMB requested that Food and Nutrition Service (FNS) submit an information collection request (ICR) for the Food Program Reporting System (FPRS) that has incorporated the required activities for the information collection instrument (FNS-583). FNS has submitted the required information collection request for FPRS which is currently under OMB review.

Part A. Justification

A. 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. The Employment and Training Program administered by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), plays an important role in ensuring as a condition of eligibility, that each non-exempt Supplemental Nutrition Assistance Program (SNAP) household member age 16 to 59 be work registered by the State agency at the time of application and once every twelve months thereafter in compliance of Section 6(d) of the Food and Nutrition Act of 2008 and SNAP regulations at 7 CFR 273.7.

A. 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.

In accordance with section 6(d) of the Act and 7 CFR 273.7(c) (8), State agencies must provide quarterly reports about their E&T Programs so that the Department can monitor State performance. All data required for this information collection activity is compiled using Form FNS-583, SNAP Employment and Training (E&T) Program Activity Report. This form was devised to provide FNS a consistent format for State agency reports. Data collected on the quarterly report includes the number of work registrants, as of October 1 (first quarterly report only), for each quarter (by month, by quarter, and year-to-date) the number of new work registrants, the number of ABAWD applicants and recipients participating in qualifying components; the number of all other applicants and recipients participating in qualifying components; the number of ABAWD case months used

under the State agency's 15 percent exemption allowance, and in addition, for the fourth quarter only, the number of individuals who participated in each component for the entire fiscal year. Once approved, State agencies submit data using the electronic Food Programs Reporting System (FPRS).

Information collected on the FNS-583 enables FNS to monitor State E&T programs and to make decisions about funding. For example, 90 percent of the annual E&T grant is based on the number of work registrants (as reported on the FNS-583) in each State as a percentage of work registrants nationwide. The data collected also helps FNS make supplemental funding decisions throughout the Federal fiscal year. FNS also uses data collected to report on program activities for Congress and shares data with the members of the general public when requested.

A. 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.

This information collection complies with the E-Government Act of 2002. The Form FNS-583 is available for download to State agencies via the internet from the FNS website (<http://www.fns.usda.gov/fsp/rules/Memo/Support/pdfs/fns-583.pdf>). The State agency may enter data into the electronic FNS-583 online via a secured web system for the Food Program Reporting System (FPRS) <https://fprs.fns.usda.gov/> and it may inspect data it has entered. Once approved, all 53 State agencies will submit FNS-583 data electronically at <https://fprs.fns.usda.gov/>.

A. 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 are no similar data collection efforts. FNS solely monitors State E&T programs performance to ensure integrity. The information required for FNS-583 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 agency administrative reporting requirements and special studies by other government and private agencies.

A. 5 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. 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 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.

If FNS could not collect this information on the FNS-583, it would be unable to make adjustments or allocate exemptions in accordance with the statute. Moreover, if it could not monitor State Agencies' quarterly exemption data, FNS could not ensure that exemptions do not exceed the number authorized.

FNS must monitor State Agency E&T Program performance to ensure that the Program is being efficiently and economically operated. If unable to collect, on a quarterly basis, the data necessary to oversee program operations, FNS could not fulfill this mandate, nor could it initiate timely, effective corrective measures to ensure program integrity and successful State Agency program operations.

A. 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.

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, 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.

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.

On February 4, 2014, FNS published the notice in the *Federal Register* (FR) Volume 79, Page 6536. FNS received one (1) public comment; however, it did not pertain to the published notice. The comment is included with this information request.

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.

Every three years each State Agency has an opportunity to comment on the notice which is sent out to State Agencies and posted on FNS website.

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

No payment or gifts were provided to any respondent.

A. 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. No confidential information is associated with this information collection.

A. 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 involved in this information collection.

A. 12 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.**

This collection includes information collected on the FNS-583 and State requests for additional E&T grant funding. State agencies do not use the FNS-583 to submit requests for additional funds. Approximately 14 States each year submit letters requesting additional funding. This information is not captured on the FNS-583. However, State agencies use data from the FNS-583 to justify requests and FNS uses data from the FNS-583 to evaluate such requests.

ESTIMATED ANNUAL REPORTING BURDEN HOURS

(A) Work registration. Under 7 CFR 273.7 (c)(8) 53 State agencies collect and report information quarterly on new work registrants.

FNS estimates that State agencies report 6.8 million work registrations each fiscal year. FNS estimates that State agencies take an average of 10 seconds (.0028 hours) per case record, to compile the data for the FNS–583.

The total burden per year to compile and report work registration data for the FNS–583 is approximately 19,278.28 hours (6,885,100 work registrants x .0028 hours = 19,278.28 hours), or approximately 363.74 hours per State agency respondent (19,278.28 hours ÷ 53 State agencies = 363.74 hours annually per State) which is approximately 90.94 hours per report (363.74 hours annually per State agency per year ÷ 4 quarterly reports = 90.94 hours).

(B) 15 percent ABAWD exemptions. Under 7 CFR 273.24(g), State agencies are required to track the number of optional ABAWD exemptions they use each month. In Fiscal Year (FY) 2013, 12 State agencies used and report the exemptions. FNS estimates that 12 State agencies will use 15 percent exemptions in FY2014 and FY2015 because they do not qualify for a statewide waiver of the time-limit and will use exemptions to cover some ABAWDs, such as those who have completed a training program and are looking for work.

State agencies track the number of 15 percent exemptions using information technology that best suits the needs of their individual systems of operations. The tracking procedure could be as simple as annotating a file. Therefore, FNS estimates that it takes 10 seconds (.0028 hours) to note each exemption.

The total burden per year to record 15 percent exemptions is approximately 220.32 hours. The estimated burden based on 12 State agencies in FY 2014 is 220.32 (4.59 hours per response x 12 State agencies x 4 responses per year)

(C) E&T activities. Under 7 CFR 273.7(f), State agencies use the FNS–583 to report the numbers of applicants and recipients they place in E&T components, both qualifying ABAWD activities and non–qualifying activities. In addition, on the 4th quarter FNS–583, State agencies report the numbers placed into specific components.

FNS estimates that State agencies make approximately 765,071 placements into E&T components each year. FNS estimates that it takes each State agency 10 seconds (.0028 hours) to compile and record the numbers of E&T component placements.

The total annual burden for recording E&T component placements is approximately 2,142.20 hours (765,071 placements x .0028 hours = 2,142.20 hours), or approximately 40.42 hours per State agency respondent (2,142.20 hours ÷ 53 State agencies = 40.42 hours per State) or 10.10 hours per response (40.42 ÷ 4 responses per State = 10.10 hours per response).

(D) Preparing the FNS-583 report. Under 7 CFR 273.7 (C)(8), FNS estimates it takes 1 hour per quarter for each of the 50 automated State agencies to prepare and enter their FNS-583s, a total of 200 hours per year (1 hour x 50 automated State agencies = 50 hours per quarter; 50 hours per quarter x 4 quarters = 200 hours).

FNS estimates it takes the remaining 3 non-automated State agencies 0.3 hours minutes each quarter, or 1.2 hours annually, to prepare and forward their FNS-583s, for a total of 3.6 hours per year (0.3 hour x 3 non-automated State agencies = 0.9 hours quarterly; 0.9 hours quarterly x 4 quarters = 3.6 hours).

The total annual reporting burden for preparing FNS-583 reports is 203.6 hours (4 hours per year x 50 State agencies = 200 hours per year; 1.2 hours per year x 3 State agencies = 3.6 hours; 200 hours (for automated reporting) + 3.6 hours (for manual reporting) = 203.6).

(E) Requests for additional E&T funds: Under 7 CFR 273.7(d)(1)(i)(F) State agencies may request additional E&T funds if needed after initial allocations are made. FNS will reallocate available funds (e.g. funds that are unallocated or funds that are allocated but will not be spent) in a fair and equitable manner. FNS estimates that 14 State agencies per year request additional funds. FNS estimates it takes one hour for a State agency to prepare a request for additional funds.

The total annual burden for preparing requests for additional funds is 14 hours or 0.26 hours per State (1 hour per request x 14 requests from State agencies = 14 hours per year ÷ 53 State agencies = 0.26 hours per State).

The total annual reporting burden is 21,858.40 hours (19,278.28 (work registration) + 220.32 (ABAWD 15% exemptions) + 2,142.20 (E&T Activities) + 203.6 (prepare and enter report) + 14 hours (request more funds) = 21,858.40 hours).

ESTIMATED TOTAL RECORDKEEPING BURDEN HOURS

Retention and Custody of Records. Under 7 CFR 277.12 (1) and (2) All financial records, supporting documents, statistical records, negotiated contracts, and all other records pertinent to program funds shall be maintained for three years from the date of submission of the annual financial status report or if any litigation, claim, or audit is started before the expiration of the three-year period, the applicable records shall be retained until these have been resolved.

The total annual recordkeeping burden for requesting FNS 583 E&T funds is approximately 29.04 hours (53 State agencies x 4 annual records = total of 212 total annual records x 0.137 hours per record = 29.04 estimated annual burden hours.)

The total annual recordkeeping burden for requesting additional E&T funds is approximately 1.92 hours (53 State agencies x 0.26415 annual records = 14 total estimated annual records x 0.137 hours per record = 1.92 burden hours.)

The total annual recordkeeping burden is 30.96 hours ((212 FNS-583 reports + 14 requests for additional funds = 226) x 0.137 = 30.96 hours).

The combined total annual reporting and recordkeeping burden is 21,889.36 hours (21,858.40 reporting + 30.96 recordkeeping).

Table A.12.1 – Reporting Estimates of Hours Burden

**COMPILING AND REPORTING FOR THE FNS-583 AND REQUESTS FOR MORE FUNDING
SNAP EMPLOYMENT AND TRAINING PROGRAM ACTIVITY REPORT**

SECTION OF REGULATION	TITLE	NUMBER OF RESPONDENTS	REPORTS FILED ANNUALLY	TOTAL RESPONSES (C x D)	ESTIMATED NUMBER OF HOURS PER RESPONSE	ESTIMATED TOTAL HOURS (C x D x F)
A	B	C	D	E	F	G
REPORTING						
7 CFR 273.7(c)(8)	Compile and report new work registrants on FNS-583	53	4	212	90.94	19,278.28
7 CFR 273.24(g)	Compile and report 15 percent ABAWD exemptions on FNS-583	12*	4	48	4.59	220.32
7 CFR 273.7(f)	Compile and report E&T activities (placements) on FNS-583	53	4	212	10.10	2,142.20
7 CFR 273.7(C)(8)	Preparing FNS-583:					
	States filing electronically	50	4	200	1.00	200
	States filing manually	3	4	12	0.3	3.6
7 CFR 273.7(d)(1)(i)(F)	Preparing requests for more funds after initial	53	0.2641	14	1	14

	allocation					
Total Reporting for FNS-583 and Additional Funds Requests		53	13.1698	698	31.32	21,858.40
RECORDKEEPING						
7 CFR 277.12	Recordkeeping burden for FNS-583	53	4	212	0.137	29.04
7 CFR 277.12	Record-keeping burden for additional requests	53	0.26415	14	0.137	1.92
Total Recordkeeping Burden for FNS 583 and Additional Funds Requests		53	4.26	226	0.137	30.96
SUMMARY						
ESTIMATED GRAND TOTAL FOR REPORTING & RECORDKEEPING	TOTAL ALL BURDENS	53	17.43	924	23.689	21,889.36

* There are 12 States without statewide waivers of the time-limit that will likely use 15 percent exemptions in FY2014

We anticipate that the information collection requirements described in this submission will be performed by administrative type staff at the State agency level. According to the Bureau of Labor and Statistics (<http://data.bls.gov/oes>), the mean hourly wage of State Office and Administrative Support Workers is \$16.78 per burden hour. The total cost is subsequently reimbursed to State agencies through their 100 percent Federal E&T allocations.

A.12.2 Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

ESTIMATED ANNUAL COST TO STATE AGENCIES

<i>Compiling work registration status</i>	\$ 323,489.54 (19,278.28 hours x \$16.78 per hour = \$323,489.54)
<i>15% ABAWD exemptions</i>	\$ 3,696.97 (220.32 hours x \$16.78 per hour = \$3,696.97)
<i>E&T activities</i>	\$ 35,946.12 (2,142.20 hours x \$16.78 per hour = \$35,946.12)
<i>Preparing FNS–583 report</i>	\$ 3,416.41 (203.6 hours x \$16.78 per hour = \$3,416.41)
<i>Preparing request for more funds</i>	\$ 234.92 (14 hours x \$16.78 per hour = \$234.92)
Total Annual Cost to State Agencies	\$366,783.96

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/startup 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 annual estimated cost to the Federal government for the FNS–583 information collection and fund request is **\$8,825**. FNS has calculated the costs as follows.

Using the 2014 GS Salary Table, we estimate it took 20 hours for a GS–13 (step 1) to prepare the 60–day Notice, and complete the ICR package, for a total of **\$862** (20 hours x \$43.09 an hour = \$861.80).

Once the GS–13–1 completed the two documents, they were reviewed and cleared by appropriate FNS officials. We used a GS–14, step 1, as the average hourly salary for these reviewing officials. We estimate it took four reviewing officials 4 hours to clear the 60–day Notice and the ICR package for a total of **\$815** (4 hours x \$50.92 an hour x 4 staff = \$814.72).

It cost **\$736** to publish the 60–day Notice in the Federal Register.

We estimate that it takes 1 hour for a GS–13, step 1, to prepare the electronic file and submit to the agency webmaster, a GS 14, step 5, who converts to the file to an Internet friendly format and posts the form to the Internet. Total cost is **\$101** ($(\$43.09 \text{ an hour} \times 1 = \$43.09) + (\$57.70 \text{ an hour} \times 1 = \$57.70) = \$43.09 + \$57.70 = \$100.79$).

\$862 Salary + \$815 Salary + \$736 publishing costs + \$1010 Salary = \$2,514.00 one time cost.

Each year FNS receives three FNS–583 forms from the three non–automated State agencies that must be entered into FPRS by Regional FNS staff. We used a GS–11, step 1, salary for such work. It takes an estimated 3 hours annually to enter the three FNS–583 reports into FPRS, for a total of **\$91** ($3 \text{ hours} \times \$30.23 \text{ hour} = \90.69).

Lastly, FNS staff must analyze the data from the FNS–583 reports each quarter. To review the number of 15 percent exemption waivers, we estimated it would take 50 hours annually for a GS–12, step 3, to analyze the data and perform the calculations necessary to establish each State agency’s exemption allowances. Thus the cost of this work is **\$1,933** per year ($50 \text{ hours} \times \$38.65 \text{ hour} = \$1,932.50$). We also estimated that it would take 100 hours annually for a GS–13, step 1, to analyze the other data reported on the FNS–583 report. The cost of this work is **\$4,309** ($\$43.09 \text{ hour} \times 100 \text{ hours} = \$4,309$).

\$91 Salary + \$1,933 Salary + \$4,309 Salary = \$6,333 annual cost to the Federal government.

By adding up the above costs, FNS calculated federal costs as \$8,825 for this information collection package ($\$2,492.10 \text{ one–time cost} + \$6,333 \text{ annual cost} = \$8,825.10$).

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 an extension of a currently approved collection. The burden estimate remains unchanged 21,889 hours.

A. 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.

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.

FNS plans to display the OMB approval number and the expiration date on this information collection.

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

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

List of Attachments

ATTACHMENT A: FNS-583 SNAP Employment and Training (E&T) Program Activity Report. A copy of the currently approved form may also be accessed at the following internet address: <http://www.fns.usda.gov/sites/default/files/FNS-583.pdf>

ATTACHMENT B: Screenshots from the Food Programs Reporting System (FPRS), the electronic system that State agencies use to report FNS-583 data and that FNS uses to review data.