

SUPPORTING STATEMENT

Supplemental Nutrition Assistance Program (SNAP):

Pre-Screening Tool

OMB No: 0584-0519

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Table of Contents

1. Circumstances Making this Information Collection Necessary	2
2. Purpose and Use of the Information	3
3. Use of Information Technology and Burden Reduction	3
4. Efforts to Identify Duplication and Use of Similar Information	4
5. Impacts on Small Businesses or Other Small Entities	5
6. Consequences of Collecting the Information Less Frequently	5
7. Explanation of Special Circumstances Relating to the Guideline of 5 CFR 1320.5	6
8. Provide 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)	7
9. Explanation of Any Payment or Gift to Respondents	8
10. Assurance of Confidentiality Provided to Respondents	8
11. Justification for Sensitive Questions	9
12. Estimates of Hour Burden Including Annualized Hourly Costs	10
13. Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers	11
14. Annualized Cost to Federal Government	12
15. Explanation for Program Changes or Adjustments	12
16. Plans for Tabulation and Publication and Project Time Schedule	12
17. Reason(s) Display of OMB Expiration Date is Inappropriate	13
18. Exceptions to Certification for Paperwork Reduction Act Submissions	13

Appendix A: Public Comment

Appendix B: Pre-screening Tool Images (English and Spanish)

A. Justification

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 information collection for the Supplemental Nutrition Assistance Program (SNAP) web-based Pre-screening Tool. In June 2003, the Food and Nutrition Service (FNS) deployed an interactive web-based pre-screening tool that can be used by the general public to determine potential eligibility for SNAP benefits. The tool has been modified since the last revision of this collection to maintain ease of use.

The pre-screening tool allows the English and Spanish speaking user to enter the household size, income, expenses and resource information in order to calculate an estimated range of benefits that the household may be eligible to receive. Since SNAP eligibility and benefit amount may vary based on program options States have implemented, FNS makes it clear that the tool is only an estimator and the household will need to contact the local agency to determine actual eligibility and the associated benefit amount.

Other data requested by the tool include:

- State or territory in which the user resides;
- Number of People: Number of people living in the household;

- Migrant Workers: Whether anyone in the household is a seasonal or migrant farm worker;
- Homeless: Whether the household is homeless or living in a shelter;
- Citizenship: Whether each member is a U.S. citizen;
- Utility expenses: Whether the client is billed for utility costs.

Although the tool also requests the name and age of the user, it neither retains the information nor requests other personally identifiable information such as social security numbers or birthdates of the household members. Once the user logs out of the pre-screening tool, none of the user-provided information is retained by FNS.

2. Purpose and Use of the Information._

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 information is used solely by prospective SNAP applicants to determine their potential eligibility for assistance and the benefit amount they may be eligible to receive. The tool does not request any personally identifiable information nor is any of the information entered by users retained by FNS.

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 compliance with E-Government Act of 2002 (E-Gov), FNS has made every effort to have electronic submission as an alternative to paper submission. The pre-screening tool was designed to ensure availability to the widest possible audience. The web-based system was developed to have minimal requirements imposed on the end-user's personal computer. It does not require the user to install any plug-ins or java applets. The interface is straightforward and simple, requires only minimal computer literacy, and makes maximum use of drop down menus, selection lists and radio buttons. The internet address of the pre-screening tool is <http://www.snap-step1.usda.gov/fns/>. See Appendix B for English and Spanish screenshots of the tool.

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 purposes described in Question 2.

Every effort has been made to avoid duplication. FNS has reviewed other government and private agencies' websites. It was concluded that similar data sources exist because FNS encourages State agencies to develop their own State-specific pre-screening tools. There is no duplication because the FNS pre-screening tool links directly to available State-specific tools. The State pre-screening tool preempts the FNS pre-screening by the user entering data into the State's tool rather than the FNS tool.

5. Impacts on Small Businesses or Other Small Entities.

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.

This information collection does not have a direct impact on any small entities.

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.

FNS offers the pre-screening tool to help low-income individuals assess their potential eligibility for SNAP benefits and, if applicable, to provide user with the amount of benefits to which they may be entitled. Without the pre-screening tool, potential applicants would be able to assess their eligibility by either researching the program's eligibility criteria or through visiting a local office. Either alternative would be more labor intensive than the use of the pre-screening tool. Research has shown that the primary reason that potentially eligible persons do not apply for SNAP assistance is because they are not aware that they may be eligible. Potential participants are more likely to apply after using a pre-screening tool.

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 that cause this 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, 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.

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.

The agency notice soliciting comments regarding this information collection was published in September 16, 2014, in the Federal Register at 79 FR 55426. One comment was received that was not relevant to whether the collection is necessary for the proper performance of the pre-screening tool. It did not question the estimate of the burden or enhance the quality, utility or clarity of the collection, and it did not address minimizing the burden or cost associated with this information collection (see public

comment in Appendix A). The commenter disagreed with the format of the pre-screening tool and stated it should include a field to input a Social Security Number (SSN). FNS does not think it is necessary to include a SSN field for prospective SNAP applicants to determine their potential eligibility for assistance as its inclusion has no bearing on the benefit amount they may be eligible to receive when assessing financial eligibility for SNAP.

FNS regularly consults with State agencies and public interest groups and takes into consideration any suggested changes regarding the pre-screening tool.

9. Explanation of any Payment or Gift to Respondents.

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

No payments or gifts are provided to respondents under this collection.

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.

Section 11(e)(8) of the Food and Nutrition Act of 2008, as amended (the Act) and section 272.1(c) of the regulations limit the use or disclosure of information obtained from applicant households or contained in the case files of participating households to persons directly connected with the administration or enforcement of the provisions of the Act or regulations, other Federal or Federally assisted means-tested programs; persons directly connected with the administration or enforcement of programs required

to participate in the State income and eligibility verification system; persons directly connected with the verification of immigration status of aliens; persons directly connected with the administration of the Child Support Program; employees of the Office of the Comptroller General of the U.S. for audit and examination authorized by other provisions of law; Local, State, or Federal law enforcement official investigating an alleged violation of the Act or regulations and law enforcement officers if the household member is a fleeing felon or a parole violator. FNS published the Privacy Act: System of Records Notice (SORN) on March 31, 2000, in the Federal Register (65 FR 17251) entitled “USDA/FNS-10 Persons Doing Business with the Food and Nutrition Service” to specify the uses of the information that is collected.

The information entered in the pre-screening tool is used solely by prospective participants in SNAP to determine their potential eligibility for assistance and the amount they may be eligible to receive. The tool does not request any personally identifiable information nor is any of the information entered by users retained by FNS.

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.

No private or sensitive questions will be asked.

12. Estimates of Hour Burden Including Annualized Hourly Costs.

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.

Affected Public: Individuals and Households; Respondent Types: Potential SNAP Clients.

The annual estimated reporting burden for each individual component of this information collection, including the estimated number of respondents, frequency of response, average time to respond and annual hour burden is shown and described below.

OMB # 0584-0519	Requirement	Estimated # of Respondents	Responses Annually per Respondent	Total Annual Responses	Hours per Response	Annual Burden Hours
Affected Public	INDIVIDUALS AND HOUSEHOLDS					
	Potential SNAP Clients					
Reporting Burden	Completion of SNAP Pre-screening Tool	402,534	1	402,534	0.167	67,223
Reporting Totals		402,534	1	402,534	0.167	67,223

Reporting Burden

The reporting burden associated with this information collection is the time required by potential SNAP applicants to complete the pre-screening tool. FNS estimates it will take approximately 402,534 users about 10 minutes (0.167 hours) to provide the required

input to receive eligibility information using the pre-screening tool. Users are expected to access the system once for a total of 402, 534 annual responses. FNS estimates 67,223 burden hours for this activity. Once the user logs out of the tool, none of the user-provided information is retained by FNS. There is no recordkeeping burden associated but this collection.

B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. Do not include the cost of contracting out or paying outside parties for information collection activities here, these costs should be included in item 14.

Annualized Costs to Respondents

The respondents using the tool are potential applicants for SNAP benefits. The following cost estimate is based on the current Federal minimum wage of \$7.25 per hour x 67,223 hours.

Cost to Potential Applicants for SNAP benefits based on the Federal minimum wage of \$7.25 per hour.	Estimated Burden Hours	Hourly Wage Rate	Estimated Annual Burden Cost (US\$)
Entry of data into the SNAP online pre-screening tool by potential applicants for SNAP benefits.	67,223	\$7.25	\$487,367
Total Cost to potential applicants			\$487,367

13. Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers.

Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two

components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation or maintenance costs associated with this information collection.

14. Annualized Cost to Federal Government.

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.

Total annual cost to the Federal government is \$12,493.45. This includes contractor costs of \$12,240 under the Level of Effort contract for maintaining, operating, and hosting the pre-screening tool over the course of 1 year. This cost is a flat fee for the contractor to test and fix links on the pre-screening tool site each month, provide data backups, monthly patches, support application, and conduct annual updates of the eligibility income standards, allotments and deductions used in the tool.

The Federal cost also includes the cost of \$253.45 for Federal worker time (headquarters) in updating and revising this collection.

	Hours	Hourly	Wage Rate*	Total
GS-12/4 Program Analyst	4		\$39.86	\$159.44
GS-13/1 Team Lead	1		\$43.09	\$43.09
GS-14/1 Branch Chief	1		\$50.92	\$50.92
Federal workers total cost:				\$253.45
Total Federal Cost:				\$12,493.45

* OPM website for Washington-Baltimore area:

<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>

15. Explanation for Program Changes or Adjustments.

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 information collection. The current burden inventory is 66,132 hours and FNS projects an increase to 67,223 hours, representing an increase of 1,091 hours due to program adjustments.

Current OMB inventory: **66,132 hours**

Total annual hours requested: **67,223 hours**

This program adjustment is primarily due to the increase of the estimated number of annual respondents. The current burden inventory reflects 396,000 respondents and this revision estimates 402,534 respondents which is an increase of 6,532 respondents.

16. Plans for Tabulation and Publication and Project Time Schedule.

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

There are no plans to publish statistical analyses.

17. Reason(s) Display of OMB Expiration Date is Inappropriate.

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. Exceptions to Certification for Paperwork Reduction Act Submissions.

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.