

SUPPORTING STATEMENT

Disaster Supplemental Nutrition Assistance for Victims of Disasters

OMB No: 0584-0336

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OMB 83-I Form

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 collection. Pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. 100–707, and Section 5(h) of the Food and Nutrition Act of 2008, 7 U.S.C. 2014(h), the Secretary of Agriculture has the authority to develop a Disaster Supplemental Nutrition Assistance Program (D–SNAP) to address the temporary food needs of people following a disaster. D–SNAP is a program that is separate from the Supplemental Nutrition Assistance Program (SNAP) and is conducted for a specific period of time. In order for a State to request to operate a D–SNAP, an affected area in the State must have received a Presidential declaration of “Major Disaster” with Individual Assistance. Once the declaration is in place, the State submits a request to operate a D–SNAP to the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS). FNS will review the request to ensure that all the necessary requirements to conduct D–SNAP are met. Upon approval of a D–SNAP, FNS provides the State support in their D–SNAP efforts through policy guidance, training, and technical assistance. This information collection is necessary for the FNS to approve State agencies’ requests to operate a D–SNAP.

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.

State Agencies that wish to operate a D–SNAP must submit a request to FNS. A request to operate a D–SNAP must contain the following information: procedures for prompt assessment of geographical area in need of D–SNAP assistance; household responsibilities; a description of post-disaster reviews; procedures to inform both the general public and households certified under the disaster program if the D–SNAP operation is extended; procedures to issue benefits; and procedures to coordinate with other State agencies to obtain additional personnel, if needed,

to supplement the State agency's regular staff. The D-SNAP request from the State and the Federal approval provide the legal foundation for issuing food assistance to victims of disasters.

The burden associated with the actual operation of D-SNAPs, including the processing of applications from households affected by disasters, is included under OMB No. 0584-0064 (SNAP Forms: Applications, Periodic Reporting, Notices; expiration date 04/30/2016), which includes all information collection activities associated with the certification of participating and applicant households. The recordkeeping burden for form FNS-292-B, Report of Disaster Supplemental Nutrition Assistance Benefit Issuance, is approved under OMB No. 0584-0037 (Report of SNAP Benefit Issuance and Commodity Distribution for Disaster Relief; expiration date: 08/31/2017), and the reporting burden is covered under OMB No. 0584-0594 (Food Programs Reporting System; expiration date: 06/30/2017); neither burden is reflected in this submission.

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), State agencies have the authority to use the technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and reporting requirements contained in this submission. FNS does not have a standardized form for D-SNAP requests at this time, due to the dynamic nature of emergency situations and the need to quickly respond to the requesting State agency; therefore, State agencies are required to submit their request to operate D-SNAPs to FNS via email or fax.

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.

There is no similar information available. FNS solely monitors issuance of D-SNAP benefits. The information required for benefits 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. 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.

Information being requested or required has been held to the minimum required for the intended use. This collection does not have a direct impact on small businesses or other small entities. While certain small businesses such as retail food stores already authorized to participate in the SNAP indirectly benefit from the D-SNAP through increased food purchasing by program recipients, this information collection does not impose any additional information collection or reporting requirements on those businesses.

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.

D-SNAP is the primary FNS nutrition assistance response to a disaster recovery phase. If this collection is not conducted, States would not be able to operate a D-SNAP to help meet the nutritional needs of households affected by disasters. This information is important to preserve program integrity and to ensure that disaster procedures are promptly and effectively implemented. This information can only be collected if and when a disaster occurs.

7. Special circumstances relating to the Guidelines of 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.

8. Comments in Response to the Federal Register Notice and efforts for consultation.

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 was published in the Federal Register on May 29, 2015, Volume 80, Number 103, Page 30651 (See Appendix A). The 60-day comment period ended on July 28, 2015. The Department received one comment that was not relevant to the collection of this information (see Appendix B). 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.

9. Explain any decisions to provide 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 payment or gift will be provided to respondents.

10. Assurances of confidentiality provided to respondents.

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 and section 272.1(c) of the SNAP 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 officials 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 Entitled Persons Doing Business with the Food and Nutrition Service" to specify the uses of the information that is collected.

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.**

Reporting Burden

Estimates of burden: The number of disasters that occur annually and the average number of households affected by the disasters cannot be predicted. During the period from fiscal year 2009 through fiscal year 2014, the number of State requests for disaster programs ranged from 3 to 23 requests per year. FNS estimates an average of 9 State agencies will submit 1 D-SNAP application per year to operate D-SNAPs for a total annual request of 9 applications per year (this is a decrease from an average of 14 applications per year).

FNS further estimates that approximately 10 hours of State personnel time are required to prepare D-SNAP application requests. The request normally contains an appeal to waive the normal SNAP operating procedures and outlines the State's proposed procedures. The burden associated with preparing requests to operate a D-SNAP does not vary significantly from disaster to disaster and is relatively independent of the scope of the disaster.

FNS projects a total burden of 90 hours for this information collection, a reduction of 30 hours from the prior approved information collection burden of 140 hours.

A summary of the burden, including the number of respondents, frequency of response, average time to respond and annual hour burden, appears below:

Reporting

OMB # 0584-0336 Affected Public	Estimated Total Annual # Respondents	Estimated Frequency of Responses per Respondents	Estimated Total Annual Responses	Estimated Total Hours Per Response	Estimated Total Annual Burden Hours
Reporting Burden State Agencies	9	1	9	10	90
Total Annual Burden Estimate	9	1	9	10	90

Record Keeping or Public Disclosure Burden Only

There is no separate recordkeeping or public disclosure burden directly associated with this information 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

SNAP information collection requirements described herein are imposed on State agency officials. The wage rates used in determining these public burden costs were based on the Bureau of Labor and Statistics (BLS) Occupational Employment Statistics estimates.

Respondents involved in this collection will be managers of State Departments of Social Services, which corresponds to Bureau of Labor Statistics Category 11-9151, Social and Community Service Managers. Based on the most recent Occupational Employment and Wage Estimates from May 2014, this category of workers earns an hourly mean wage of \$32.56¹. However, 50 percent of the administrative costs incurred by State agencies are reimbursed by FNS. According to the burden hours shown above, FNS estimates that this information collection will result in a total cost across State agencies of \$1,465 per year ($32.56 \times 90 \text{ hrs} = 2,930.40 \times 0.5 = 1,465.20$).

13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or record keepers resulting

¹ <http://www.bls.gov/oes/current/oes119151.htm>

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.

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.

This information collection assumes that each D-SNAP request requires a total of 20 hours of Federal employee time: 17 hours for a Program analyst (GS-12), 2 hours for a Branch Chief (GS-14) and 1 hour for a Division Director (GS-15). The calculations for this cost are described in the table below:

Burden – Review of State agency D-SNAP requests	# of Respondents	Hours	Est. Total Annual Burden Hours	Estimated Hourly Wage Rate* 2	Cost (US\$) (approx.)*
Program Analyst (GS-12/1)	9	17	153	\$36.60	\$5,600
Branch Chief (GS-14/1)	9	2	18	\$51.43	\$926
Division Director (GS-15/1)	9	1	9	\$60.49	\$544
	Federal workers cost				\$7,070
	50% Federal Share of State Cost (See Table A.12.B.1)				\$1,465
	Total Federal cost (Federal workers cost + 50% State Cost)				\$8,535
	Total State and Federal Cost				\$10,000

*Rounded to the nearest dollar

15. Explanation of 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 an approved information collection. The burden has been reduced by 30 hours.

² Federal General Schedule Salary Table 2015-DCB: http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/DCB_h.pdf

While the number of disasters that occur annually and the average number of households affected by the disasters cannot be predicted, this reduction is primarily due to the fact that, during the period from fiscal year 2009 through fiscal year 2014, the number of State D-SNAP requests ranged from 3 to 23 requests per year, for an average of 9 D-SNAP requests per year, which is a decrease from the previously approved average of 14 D-SNAP applications per year.

Current OMB inventory: **140 hours**

Total annual hours requested: **90 hours**

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. Displaying the OMB Approval Expiration Date.

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 the certification statement identified in Item 19.

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

There are no exceptions to the certification statement.