

Supporting Statement for OMB Clearance

**Supplemental Nutrition Assistance Program
State Agency Performance Reporting Tool**

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A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

State agencies administering Supplemental Nutrition Assistance Programs (SNAP) are mandated to participate in a computer matching program with the federal Office of Child Support Enforcement (OCSE). The computerized matching program compares each state SNAP agency's applicant and recipient information with employment information maintained in the National Directory of New Hires (NDNH). The outcomes of the computerized match provide each state SNAP agency with information that will help to establish or verify an individual's eligibility for SNAP assistance. Determining eligibility also helps each state agency to reduce payment errors, identify duplicate participation, and maintain program integrity. To receive NDNH information, each state SNAP agency must enter into a computer matching agreement with OCSE and adhere to its terms and conditions, including providing OCSE with annual performance outcomes attributable to the use of NDNH information.

The Office of Management and Budget (OMB) requires OCSE to periodically report performance measurements demonstrating how the use of NDNH information supports OCSE's strategic mission, goals, and objectives. OCSE will fulfill this performance measurement reporting requirement by providing the performance outcomes information collected from each state SNAP agency to OMB.

The information collection activities associated with the SNAP performance reports are authorized by: 1) subsection 453 (j)(10) of the Social Security Act (42 U.S.C. §653(j)(10)), which allows the Secretary of the U.S. Department of Health and Human Services to disclose information maintained in the NDNH to state agencies administering SNAP under the Nutrition Act of 2008, as amended by the Agriculture Act of 2014; 2) the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988 (5 U.S.C. § 552a), which sets for the terms and conditions of a computer matching program; and 3) the Government Performance and Results Modernization Act of 2010 (Pub. L. 111-352), which requires agencies to report program performance outcomes to OMB and for the reports to be available to the public.

2. Purpose and Use of the Information Collection

2.1 How the collected information will be used

The information collected will be used to measure, and report to OMB, cost-savings to state SNAP agencies that are attributable to the NDNH.

2.2 By whom the collected information will be used

The collected information will be used by OCSE.

3. Use of Improved Information Technology and Burden Reduction

The performance reporting tool for this information collection is a commonly used electronic spreadsheet that is formatted to perform automated data calculations of inputted values. State SNAP agencies populate the performance reporting tool and submit it to OCSE electronically. Using available technology and electronic processes eliminates manual calculation and computation errors, as well as costs to submit the reports by mail.

4. Efforts to Identify Duplication and Use of Similar Information

State SNAP agencies' performance outcomes that are attributable from computerized comparisons with the NDNH are unique and not available from other sources.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

OCSE requires state SNAP agencies to provide their performance outcomes reports annually. Collecting the information less frequently would result in OCSE providing outdated cost-savings measurements and inaccurate periodic performance reports to OMB. Not collecting the information at all would also jeopardize OCSE's ability to comply with the federal requirement to provide OMB with the periodic performance reports.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Not applicable.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A notice of the information collection was published in the *Federal Register* at 80FR15224 on March 23, 2015, which allowed a 60-day comment period for the public to submit in writing comments about this information collection. No comments were received.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Confidentiality for the respondent is not necessary because the information collected does not contain personally identifiable information. Respondents will provide financial

information demonstrating cost avoidance resulting from the SNAP-NDNH computer matching program.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

The burden hours are estimated from information received from two states who already participate in the SNAP NDNH computer matching program. They reported the average time it took them to compile the performance outcomes information into the performance reporting tool.

Table 12.1 Respondents’ Hour Burden

Instrument	Number of Respondents (SNAP Agencies)	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours*
SNAP Agency Matching Program Performance Reporting Tool and Instructions	52	1	1.625	84

*Figures have been rounded up.

The annualized cost to respondents for the burden hour is based on an average wage rate of \$19.56 per hour for state employees.¹ The average annualized cost per respondent is \$32 (\$19.56 x 1.625). The total cost to all respondents is \$1,664.

Table 12.2 Respondents’ Cost for Hour Burden

Respondent	Average Annualized Cost Per Respondent²	Total Annualized Cost
52 State SNAP Agencies	\$32	\$1,664

¹ Based on Bureau of Labor Statistics July 2011 National Compensation Survey Hourly wages

² Total rounded up from \$31.78

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no capital, start-up costs, and no ongoing costs to the respondent. The information collected is populated into a universally used desk-top application.

14. Annualized Cost to the Federal Government

The cost to the federal government to administer the SNAP NDNH computer matching program is included in the overall cost to the federal government to operate and maintain the NDNH (OMB #0970-0166), which is estimated to be \$9.9 million. This cost includes the system development and technical assistance contracting costs, telecommunications, security, data quality, and software and hardware costs incurred by OCSE in association with the NDNH.

The SNAP performance reporting tool to be used for collecting information will be transmitted electronically. The information collected from state SNAP agencies will be used as part of OCSE's federal requirement to provide periodic performance measurement reports to OMB. As a result, there are no other costs to the federal government for this information collection.

15. Explanation for Program Changes or Adjustments

Not applicable.

16. Plans for Tabulation and Publication and Project Time Schedule

The information collected will be provided in an annual report to OMB.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

SUPPORTING STATEMENT:

**PART B – COLLECTION OF INFORMATION EMPLOYING
STATISTICAL METHODS**

The information collection requirements outlined in this report do not employ the use of statistical methods.