

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

**Annual State Report on Verification of Supplemental Nutrition Assistance Program
Participation**

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A1. 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 new collection to meet Supplemental Nutrition Assistance Program (SNAP) reporting requirements specified in Section 4032 of the Agricultural Act of 2014. Section 4032 mandates that States will “submit to the Secretary a report containing sufficient information for the Secretary to determine whether the State agency has, for the most recently concluded fiscal year preceding that annual date, verified that the State agency in that fiscal year- (1) did not issue benefits to a deceased individual; and (2) did not issue benefits to an individual who had been permanently disqualified from receiving benefits.”

This collection implements Section 4032 by requiring State agencies to verify that systems are in place to comply with associated regulations governing SNAP. SNAP regulations at 7 CFR 273.16 require that State agencies disqualify an individual who has committed an intentional program violation (IPV). Paragraph 7 CFR 273.16(e)(8) requires that these individuals “be disqualified in accordance with the disqualification periods and procedures in paragraph (b) of this section” (273.16(b)). Paragraph 7 CFR 273.16(i) requires State agencies to report information concerning each individual disqualified for an IPV to the disqualified recipient database, the electronic Disqualified Recipient System (eDRS), and to use eDRS data to determine the eligibility of individual applicants prior to certification. SNAP regulations at 7 CFR 272.14 require that each State agency establish a system to verify and ensure that benefits are not issued to individuals who are deceased, and that data source is the Social Security Administration’s (SSA) Death Master File.

A2. 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.

The information required for the Annual State Report on Verification of SNAP Participation is obtained by validating that the State agency had the appropriate systems in place and followed procedures currently mandated at 7 CFR 272.14 and 7 CFR 273.16 for the preceding fiscal year. State agencies must annually confirm, by stating in an email to their FNS Regional SNAP Program Director, that the appropriate systems were in place in the State to meet the requirements of regulations at 7 CFR 272.14 and 273 .16(i)(4), and that they conducted the matches required by these regulations.. States are required to submit their Section 4032 reports to the FNS Regional SNAP Director by March 31 each year for the preceding Federal fiscal year. 7 CFR 272.1(f) mandates that State agencies are required to retain all records associated with the administration of SNAP for no less than 3 years.

A3. 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.

FNS makes every effort to comply with E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. The collection will most commonly occur via electronic mail (email).

A4. Efforts to identify duplication.

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 USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNS monitors State performance to ensure program integrity and that the program is efficiently and economically operated.

A5. 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. Although two 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 agencies. Thus, they maintain the same kinds of information on file.

A6. 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.

The Agricultural Act of 2014 mandates this annual verification be reported to FNS. Requiring this verification less frequently, therefore, would be non-compliant with Federal statute.

A7. 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.

A8. Comments 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.

FNS published a 60-day notice for comments in the Federal Register on April 29, 2015 in

Volume 80 on Page 23767. FNS received no comments submitted by the completion of the 60-day comment period.

On May 5, 2015, FNS issued a letter to all State SNAP agencies explaining the implementation of the Section 4032 of the Agricultural Act of 2014, which mandates this collection. FNS Regional Offices maintain frequent contact with individual State agencies, affording them the opportunity to discuss the proposed collection. Additionally, on May 28, 2015, FNS hosted a discussion with American Public Human Services Association stakeholders. During this discussion, FNS explained the requirements of the Agricultural Act of 2014 and its implementation, and solicited feedback from stakeholders.

A9. 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.

FNS has no plans to provide payments or gifts to respondents.

A10. 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.

Agency complies with the Privacy Act of 1974.

A11. Justification for any questions of a sensitive nature.

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 included in this submission.

A12. Estimates of the hour burden of the collection of information.

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.

53 State agencies will be required to report this information once annually for an estimated total annual responses of 53. The estimated reporting burden per State agency is 1 hour for a total of 53 burden hours. The total burden includes the time it will take the State agency to consult with the appropriate agency departments to confirm that the proper systems are in place throughout the agency (0.75 hours per respondent), and to draft and send the confirmation email to the FNS Regional SNAP Director (0.25 hours per respondent). The total reporting burden is 53 hours. The estimated recordkeeping burden per agency is 0.083 hours (5 minutes). This estimate accounts for the time it will take State agencies to comply with the 3-year record retention requirement. The total recordkeeping burden is 4.40 hours. The total combined burden is 57.4 hours.

Table A12.A Reporting Burden for State Agencies

Agricultural Act of 2014	Action	Number of Respondents	Total Annual Responses	Burden Hours Per Response	Total Burden Hours
Sec. 4032	Information Collection and Reporting	53	53	1.0	53
Sec. 4032	Recordkeeping	53	53	0.083	4.4
Total		53	53	1.083	57.4

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

Based on the Bureau of Labor Statistics May 2014 Occupational and Wage Statistics – 43-4061

(<http://www.bls.gov/oes/current/oes434061.htm>), hourly mean wage for Eligibility Interviewers, Government Programs functions performed by State and local agency staff are valued at \$20.41 per hour. The information requested in this collection will, therefore, be collected and recorded by State staff at \$20.41 per hour, for 0.833 hours per respondent (0.75 hours for collection + 0.083 hours for recordkeeping). This totals to \$901.08 annually.

Based on the Bureau of Labor Statistics May 2014 Occupational and Wage Statistics – 43-4061 (<http://www.bls.gov/oes/current/oes113011.htm>), hourly mean wage for Administrative Services Managers functions are valued at \$44.35 per hour. The information requested will be reported via email by State agency managers at \$44.35 per hour, for 0.25 hours per respondent. This totals to \$587.64 annually.

The combined annualized cost is \$1,488.72. The federal share of this cost is 50%; therefore, 50% of this cost is reimbursed to the respondent. The total annualized cost to respondents is \$744.36.

Table A12.B Reporting Cost for State Agencies

State Staff	Action	Total Annual Responses	Staff Hours per Response	Staff Cost per Hour	Cost Per Response	Total Cost
Eligibility Interviewer	Information Collection	53	0.75	\$20.41	\$15.31	\$811.30
Eligibility Interviewer	Recordkeeping	53	0.083	\$20.41	\$1.69	\$89.78
Administrative Manager	Reporting	53	0.25	\$44.35	\$11.09	\$587.64
Subtotal	All	53	1.083	\$25.94	\$28.09	\$1488.72
Less %50 Federal Reimbursement						\$744.36
Total						\$744.36

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers 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 and/or annualized maintenance costs associated with this burden.

A14. Provide estimates of annualized cost to the 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.

Annualized costs for the Federal government include 50% of the total cost to State agencies.

Based on the total estimated burden for State agency reporting of 57.42 hours, the total cost is \$1488.72. The Federal share is 50% of the total cost, or \$744.36. Federal costs for this burden also include the time 26.5 hours for FNS Regional SNAP Directors to review and file the 53 Agency responses. At a rate of \$50.41 per hour (equivalent to GS-14, Step 1), this totals \$1,335.86. The combined annualized cost to the Federal government is \$2,080.22.

A15. 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-I.

This is a new collection as a result of program changes will add 57 burden hours to the burden inventory.

A16. 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.

FNS does not intend to publish the information included in this collection.

A17. 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.

FNS is not seeking approval to omit the expiration date of OMB.

A18. Exceptions to the certification statement identified in Item 19.

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.

ATTACHMENT A
Section 4032, AGRICULTURE ACT OF 2014 (THE 2014 FARM BILL)

SEC. 4032. ANNUAL STATE REPORT ON VERIFICATION OF SNAP PARTICIPATION.

(a) ANNUAL REPORT.—Not later than 1 year after the date specified by the Secretary during the 180-day period beginning on the date of enactment of this Act, and annually thereafter, each State agency that carries out the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.) shall submit to the Secretary a report containing sufficient information for the Secretary to determine whether the State agency has, for the most recently concluded fiscal year preceding that annual date, verified that the State agency in that fiscal year—

- (1) did not issue benefits to a deceased individual; and
- (2) did not issue benefits to an individual who had been permanently disqualified from receiving benefits.

(b) PENALTY FOR NONCOMPLIANCE.—For any fiscal year for which a State agency fails to comply with subsection (a), the Secretary shall impose a penalty that includes a reduction of up to 50 percent of the amount that would be otherwise payable to the State agency under section 16(a) of the Food and Nutrition Act of 2008 (7 U.S.C. 2025(a)) with respect to that fiscal year.

(c) REPORT OF PILOT PROGRAM TO TEST PREVENTION OF DUPLICATE PARTICIPATION.—Not later than 90 days after the completion in multiple States of a temporary pilot program to test the detection and prevention of duplicate participation by beneficiaries of the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the Secretary shall submit to the Committee on Agriculture of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate a report assessing the feasibility, effectiveness, and cost for the expansion of the pilot program nationwide.