

**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)**

**OMB CLEARANCE NUMBER 0584-New**

**Employment and Training Performance**

**Measurement, Monitoring and Reporting Requirements**

**RIN 0584-AE33**

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**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 a new collection. The Department is requiring that State agencies report outcome data for SNAP Employment and Training (E&T) programs as mandated by Section 16(h)(5) of the Food and Nutrition Act (FNA) as amended by section 4022 of the Agricultural Act of 2014. The Department is establishing five separate reporting measures and is requiring State agencies to report outcome data to monitor the effectiveness of E&T programs: (1) the number of E&T participants who enter unsubsidized employment; (2) the number of E&T participants who retain unsubsidized employment for at least three months after entering employment; (3) the average cumulative earnings per participant over three months of unsubsidized employment, (4) the total number of participants that completed a training, educational, work experience or an on the job training component; and (5) certain unique characteristics of SNAP E&T participants that will provide information on the challenges they face in obtaining employment. State agencies are also required to identify appropriate reporting measures for each proposed component that serves a threshold number of participants of at least 100 a year. The reporting measures for these components will be identified in State agencies' E&T plans and the outcome data will be reported to the Food and Nutrition Service (FNS) in State agencies' annual reports. State agencies will be required to report outcome data annually.

**2. Indicate how, by whom, 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.**

Since this is a new collection, FNS has not had this information to date. While a number of State agencies have collected various pieces of information about the outcome of their E&T efforts, this rule will require the reporting of uniform outcome data. With this information, FNS will be able to identify more, and less, successful E&T practices and work with State agencies to improve their E&T programs. This process is critical to building a more effective E&T operation nationally that will help move more individuals into the workforce more quickly. Beyond the many benefits that earnings provide to SNAP's low income population, they also reduce the cost of SNAP.

**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.**

SNAP is administered and operated by State and local government agencies and as such it is their decision on how data is collected. State agencies submit numerous reports to FNS regarding SNAP, the vast majority are generated by automated systems. The Department supports States automation and modernization efforts and their development is funded with matching funds. For this new requirement, States are expected to automate the data collection process as much as possible and the Department will facilitate electronic submission of the

information collection. The Department is also committed to complying with the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes.

**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.**

Every effort has been made to avoid duplication. FNS has reviewed USDA recordkeeping requirements, state administrative agency recordkeeping requirements, and special studies by other government and private agencies. FNS solely monitors and administers SNAP.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

**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.**

Without this data collection, FNS will continue to be severely limited in understanding effective E&T practices and providing assistance to States in improving their operations. FNS considered more frequent (quarterly) collection of the reporting measures, but determined that the data would be incomplete and its usefulness uncertain. Beyond the FNA requirement that measures

be reported annually, less frequent reporting would result in FNS frequently relying on outdated information.

**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:**

- **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 circumstances that will cause the information collection to be inconsistent with the guidelines of 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, 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.**

A 60 day Federal Register Notice is embedded in the Proposed Rule, Supplemental Nutrition Assistance Program (SNAP): Employment and Training Program Monitoring, Oversight and Reporting Measures published in the Federal Register. Comments will be addressed in the final rule.

- **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 form, and on the data elements to be recorded, disclosed, or reported.**

FNS consults with Regional Offices regarding any proposed changes as the result of legislative, regulatory or administrative changes. Regional offices are in constant contact with State agencies which provide feedback on FNS processes and procedures that may impact them. Additionally, FNS has consulted with staff from the Department of Labor regarding their experience with reporting measures including current and potential changes to measures.

**9. 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. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Department complies with the Privacy Act of 1974. No confidential information is associated with this information collection.

**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 questions of a sensitive nature included in this clearance package.

**12. Provide estimates of the hour burden of the information collection. The statement should include:**

**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.**

The Department has determined that the effect on State Agencies will be two-fold: one-time capital costs for developing new or modifying existing data collection systems for E&T programs (see question 13) and ongoing reporting burden for collecting and reporting data for the required outcome measures.

***Ongoing State Agency Reporting Burden:*** States currently monitor E&T activity and report that information quarterly to FNS using the SNAP Employment and Training (E&T) Program Activity Report, also known as the FNS-583 report (OMB No. 0584-0594, Expiration date 6/30/17). The FNS-583 requires that States report the number of new registrants, Able-Bodied Adults Without Dependents (ABAWD) applicants and recipients participating in qualifying components (i.e., work slots that satisfy ABAWD work requirements and protect them from the 3-in-36-month time limit), other applicants that participate in qualifying components, and case-month exemptions for ABAWDS that have been exempted under State discretionary exemption policies. This report carries a burden estimate of 32 hours and accounts for time needed to review instructions, search data sources, compile and maintain the necessary data, and review and finalize the information that has been collected. The Department anticipates that the additional time burden from these new reporting requirements will be similar to what currently exists as a result of the FNS-583 reporting requirements – with the caveat that some data elements might take slightly more time to collect, while others might take less time.

State agencies will continue to use a combination of methods to collect the outcome data, including existing automated data systems, new data collection, sampling methods, and some



direct contact with SNAP E&T participants. FNS estimates that the ongoing additional time burden will average no more than about 231 hours annually per State (about one and a half staff-months) on average (12,233 hours per year for all States), or less than \$1 million in total. The breakdown of the 231 hours is itemized in the table below. FNS believes this estimate may be somewhat high since data that can be collected through automated data systems is expected to require less time than data collected through direct contact with SNAP E&T participants.

<b>Estimated Ongoing Reporting and Recordkeeping Burden Hours</b>						
<b>Regulation Section</b>	<b>Description of Activity</b>	<b>Number of Respondents</b>	<b>Annual Report/Record Filed</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours Per Response</b>	<b>Total Burden Hours</b>
<b>272.1(f) Recordkeeping</b>		53	1	53	1	53
<b>273.7(c)(17)(i) Reporting</b>	E&T participants who have earnings in the second quarter after completion of E&T	53	1	53	40	2120
<b>273.7(c)(17)(ii) Reporting</b>	E&T participants who have earnings in the fourth quarter after completion of E&T	53	1	53	40	2120
<b>273.7(c)(17)(iii) Reporting</b>	Median quarterly earnings	53	1	53	40	2120
<b>273.7(c)(17)(iv) Reporting</b>	E&T participants that completed a training, educational, work experience or an on-the-job training component within 6 months after completion of participation in E&T	45	1	45	80	3600
<b>273.7(c)(17)(v)</b>	Characteristics of	53	1	53	20	1060

<b>&amp; (vi) Reporting</b>	E&T participants, some broken out by 4 above measures					
<b>273.7(c)(17)(vii) Reporting</b>	Measures in a State agencies' E&T plan for components that are designed to serve at least 100 E&T participants a year	53	1	53	20	1060
<b>273.7(c)(17)(viii) Reporting</b>	Information about ABAWDs from State agencies that have committed to offering them participation in a qualifying activity	10	1	10	10	100
<b>Total Reporting</b>		<b>53</b>	<b>7</b>	<b>320</b>	<b>38</b>	<b>12,180</b>
<b>Total Recordkeeping</b>		<b>53</b>	<b>1</b>	<b>53</b>	<b>1</b>	<b>53</b>
<b>Total</b>		<b>53</b>	<b>7.03774</b>	<b>373</b>	<b>32.7962</b>	<b>12,233</b>

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

According to the Bureau of Labor Statistics, the average compensation cost per hour for state employees was \$43.07 in June 2014. The annual cost to States of the reporting requirements is estimated to be \$526,875.

The Department funds SNAP E&T programs through \$90 million in E&T grants and an additional \$20 million in grants for State agencies that pledge to serve all ABAWDs at-risk of losing eligibility due to time-limited participation. In addition to these grants, the Department reimburses State agencies for 50 percent of approved administrative costs beyond the E&T grant. Therefore, the cost to States for implementation and ongoing reporting of performance measures may be paid for in their entirety by their Federal grant.

**13. 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 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.**

*State Agency Capital Costs to Implement Interim Rule:* In the first year that the rule is published, State agencies will need to develop new E&T data collection systems, reprogram existing systems, build interfaces between SNAP eligibility and SNAP E&T data collection systems and decide what data will be collected manually. Thirty-six State agencies currently have reporting measures and collect outcome data. However, the interim rule requires the addition of several data elements that none of these States are currently collecting. While the Department believes that some of these State agencies may build on the systems they already have in place with modifications to meet the provisions of this rule, others may decide to implement new systems to meet the increase in data that is required to be collected and reported to FNS. The remaining 17 State agencies that do not have reporting measures in place will all need to develop new systems to collect the required data.

For several of the measures (e.g., obtaining employment, level of pay, characteristics of E&T participants) State agencies' current SNAP automated eligibility systems could be used to generate the needed data, although the older legacy systems are often less flexible than newer systems. The Department anticipates that some State agencies will rely on the private vendors or State labor agencies for the required data and will need to renegotiate contracts and agreements. The Department is allowing State agencies to use random sampling as an interim approach to

reduce the burden of developing new systems, and it is assumed that about half of the States will use a sampling method to gather data for some of the reporting measures. Starting for reports due in January 1, 2019, State agencies will be asked to describe their plans to move towards the use of administrative data, and their efforts to resolve any issues that may prevent them from doing so.

Congress allowed a minimum of 180 days after publication to include measures in States' E&T plans. We anticipate that it will take an average of 3 staff months (520 hours) per State to implement this rule. According to the Bureau of Labor Statistics, the average compensation cost per hour for state employees was \$43.07 in June 2014. Assuming a 2 percent increase in wages, the cost of implementing this rule is estimated to be approximately \$1.2 million. However, a portion of that cost will be paid for by the federal government through matching funds. In addition, States may choose to fund these capital costs through their 100% E&T grant, in which case the cost to the State and federal governments is \$0. If these should prove insufficient in some cases, the State would be reimbursed at a 50 percent of any additional costs.

Description of Activity	Number of Respondents	Total Annual Responses	Number of Burden Hours Per Response	Total Burden Hours
One-time capital start-up and operating and maintenance costs	53	53	520	27,560

**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 Department estimates that the cost to the Federal government for establishing reporting measures is minimal. The Department will analyze outcome data provided by State agencies but

this is part of a program analyst's normal responsibilities. In addition, while the new reporting measures will result in a small increase in State administrative costs, the federal share of these costs is expected to be minimal.

**15. Explain the reasons for any program changes or adjustments reported in item 13 or 14 of the OMB 83-I.**

This is a new collection mandated by Section 16(h)(5) of the Food and Nutrition Act. As a result of program changes associated with the interim rulemaking, this collection will increase the OMB inventory by 12,233 hours annually.

**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.

**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.**

We are not seeking approval concerning the display of the expiration date.

**18. Explain each exception to the certification statement identified in Item 19**

**"Certification for Paperwork Reduction Act."**

There are no exceptions to the certification statement.