

**Appendix D: Burden Narrative - Estimate of the Information Collection Burden  
Associated with the Proposed Rule -- Proposed Rule: Supplemental Nutrition Assistance  
Program (SNAP): Disaster Supplemental Nutrition Assistance Program (D-SNAP) (RIN  
0584-AE00)**

This document explains the burden calculations for the Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) to include the reporting and recordkeeping requirements contained in the Proposed Rule “SNAP: Disaster Supplemental Nutrition Assistance Program (D-SNAP)”. The rule would amend SNAP regulations to implement provisions of The Disaster Relief and Emergency Assistance Act (1974), as amended by the Robert T. Stafford Disaster Relief and Assistance Act (1988) (enclosed) and accompanying Executive Order 12673, and Section (5)(h) of the Food and Nutrition Act of 2008 (the Act), which authorizes the Secretary of the Department of Agriculture and the Food and Nutrition Service (FNS) to determine the need for operating a D-SNAP during a presidentially-declared disaster and establish temporary emergency standards of eligibility for households affected by a disaster after commercial channels of food distribution have been restored.

Due to the dynamic nature of emergency situations and the need to quickly respond to the State agency partners, FNS does not require a standardized form or specific format for D-SNAP plans, D-SNAP requests, daily reports and post-disaster reports at this time, and encourages its State agency partners to submit information to FNS via email or fax for the majority of this information collection request.

**OMB No. 0584-[NEW]**  
AFFECTED PUBLIC: STATE AGENCIES

Requirements for Participating State Agencies

Reporting Burden

- 1.) 7 CFR280.1: Under this information collection, FNS would require the 53 States agencies that administer SNAP to review their existing Disaster Plan on at least an annual basis and submit a notice of no change to FNS, which will take an average of 6.58 staff hours per State agency each year to review their Disaster Plans, for a total burden of 349 hours (53 States x 1 response = 53 total annual response x 6.58 hours = 349 hours). FNS further estimates that an average five State agencies will update their plans annually, which will require an additional 2.5 hours, for an annual total of 12.5 burden hours. (5 States x 1 response annually). Once approved by OMB, the burden for this activity will be merged into OMB Control No. 0584-0083, Operating Guidelines, Forms, Waivers Program and Budget Summary Statement (expiration date 4/30/2017).
  
- 2.) CFR280.8: FNS will require that States operating a D-SNAP must submit a daily report to FNS. Daily reports are used to monitor progress, troubleshoot problem areas, inform FNS policy officials, ensure that adequate funds are available, and respond to inquiries from the media and other government agencies. FNS estimates that State agencies will submit an average of five daily reports and each report will require 0.5 hours to prepare, for a total annual burden of 22.5 hours (nine disasters annually x five reports x 0.5 hours = 22.5). FNS further proposes that a post-disaster report be submitted that includes four parts: a comprehensive review, individual case

reviews, problem analysis, and proposed improvements. FNS estimates this report will require State staff 0.5 hours to complete, for a total burden of 4.5 hours (nine disasters annually x 1 post-disaster report x 0.5 hours). FNS will not require a standardized form or specific format for daily reports or post-disaster reports, due to the dynamic nature of emergency situations and the need to quickly respond to conditions on the ground. Once approved by OMB, this proposed burden will be merged with the currently approved burden for OMB Control No. 0584-0083, SNAP: Operating Guidelines, Forms, and Waivers, Program and Budget Summary Statement (expiration date 04/30/2017).

#### **Recordkeeping Requirements--Part 2XX**

7 CFR 280.1(b): *Planning for a D-SNAP*

There are recordkeeping burdens maintained in a separated OMB Control No.: 0584-0083, Expiration Date: 4/30/ 2017.

#### **Public Disclosure Requirements--Part 2XX**

There is no public disclosure burden.