

**Supporting Statement for Paperwork Reduction Act Submission**

**Food Programs Reporting System (FPRS)**

**OMB CLEARANCE NUMBER: 0584-0594**

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- Attachment 3: FNS Public Comment Parke Wilde
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- Attachment 15: FNS Public Comment – RNECE-South Region
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## JUSTIFICATION

**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 revision of a currently approved information collection request (ICR). FPRS facilitates data gathering for the reporting of data for the Special Supplemental Nutrition Program (SNAP) and the Special Nutrition Programs. FPRS is the primary collection point for program performance statistics and financial data from State agencies (SA), Indian Tribal Organizations (ITO), and U.S. Territories participating in the nutrition assistance programs. This information collection pertains to 20 FNS collections currently approved by OMB. The reporting burdens for these collections will merge with FPRS once approved by OMB. There are no recordkeeping burdens associated with FNS-759. Each program has multiple information collection packages and they are listed here by program:

<b>Currently OMB approved information collection packages</b>		
OMB Control Number	Worksheet/Form number	Expiration Date
<b>Child Nutrition Program</b>		
0584-0002	FNS-10	6/30/2017
0584-0075	FNS-13	6/30/2017
0584-0280*	FNS-418	3/31/2016
0584-0055	FNS-44	09/30/2016
0584-0067	FNS-777	5/31/2016
0348-0061	SF-425	2/28/2015
<b>Special Nutrition Assistance Program</b>		
0584-0025	FNS-101	6/30/2017
0584-0069	FNS-209	6/30/2017
0584-0083	FNS-366A & FNS-366B	4/30/2017
0584-0081	FNS-388 & FNS-388A	3/31/2017
0584-NEW	FNS-778 & FNS-778A	
0584-0339	FNS-583	6/30/2017
0584-0037	FNS-292A&B	6/30/2017
0584-0080	FNS-46	6/30/2017

0584-0542	FNS-759	8/31/2016
<b>Food Distribution Programs</b>		
0584-0293	FNS-667, FNS-152, FNS-153, & FNS-667	6/30/2017
0584-0025	FNS-191 & FNS-101	6/30/2017
0348-0061	SF-425	2/28/2015
<b>Special Supplemental Food Program for Women, Infants and Children (WIC)</b>		
0584-0447	FNS-683 & FNS-203	6/30/2017
0584-0541	FNS-683A	5/31/2016
0584-0431	FNS-648	6/30/2017
0584-0045	FNS-798 & FNS-798A	6/30/2017
0348-0061	SF-425	2/28/2015
<b>Grants Management</b>		
0348-0061	SF-425	2/28/2015

\*Currently at OMB under review.

Note that the FPRS system also includes form FNS-674 (OMB Control Number 0584-0532; Expiration date 3/31/18) which is an FNS User Access form, used for all FNS systems. Screenshots are included of this form, but burden for this form will remain under the existing collection as the form is not specific to FPRS.

**2.) 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.**

This planned revision is only for Section 11 of the Food and Nutrition Act (FNA) 2008 (7 U.S.C) 2020 (f)(3)(B)(ii) which requires State agencies (SA) submit the Education and Administrative Reporting System (EARS) FNS 759 form during the next fiscal year for reporting on the prior one. FNS intends to update the EARS form to reflect specific changes that are a direct result of provisions in the Healthy Hunger-Free Kids Act (HHFKA) of 2010. Due to the new funding mechanism of allocating 100% Federal grant funding to states as opposed to matching State funds, FNS determined that it no longer needs to collect financial information through this form. The form currently provides data on demographic characteristics of participants receiving nutrition education benefits, information about education topics, strategies used to reach participants, partnerships and use of resources. FNS uses the data to monitor State agency

activity levels and performance. Using the FNS forms/worksheets, State agencies, Indian Tribal Organizations, and local agencies that enter into agreements with the Federal government use FPRS to submit data to FNS electronically. The data is gathered at various times, ranging from monthly, quarterly, annual or final submissions. The primary use for this information is collected from the FNS 759 to support management decisions, policy initiatives and provide documentation for legislative and other requests that support planning within the agency. Multiple commenters requested FNS to provide additional examples and enhanced set of instructions for this form. In response, FNS will develop training to assist people with completing each item. For details on the use of each form, please see attachment “FPRS Forms Purpose.”

The proposed revisions to the FNS-759 are not yet available in FPRS and, therefore, screenshots are not available. Only the current, unrevised form is available in FPRS. It will take our contractor 4-months to program the revised form. Once the revised form is programmed and available in FPRS, SNAP will provide a screenshot of the form.

The updates to EARS reflect specific changes that are a direct result of the provisions in the HHFKA. Changes to the program mandated by the HHFKA require revisions to the currently approved EARS form/worksheet are:

1. A focus on the critical problem of obesity- The program now has a wider range of intervention strategies.
2. A target population which more closely aligns SNAP-Ed participants with those in other FNS, Federal, and State-administered benefit programs.

3. Requirements for evidence based interventions- FNS has provided states with more flexibility to include the implementation and measurement of evidence-based of Policy, Systems and Environmental changes (PSE's)
4. A new funding mechanism-As opposed to matching State funds for SNAP-Ed programs, FNS allocates 100 percent Federal grant funding to States

The proposed modifications to the current EARS form to support the program changes as mandated by the HHFKA are as follows:

- The form continues to collect demographic information on age and sex for direct education, with these two questions streamlined into a single table.
- The form continues to collect information on Race and Ethnicity.
- The form will now collect information on settings by Domain.
- The form will now collect information on SNAP-Ed eligibles that participate in any or all three types of interventions, i.e Direct Education, Social Marketing and /or PSE change interventions.
- The form will included an expanded list of SNAP-Ed intervention topics.
- The form will now collect information on Partnerships.

FNS will provide training to one representative from each of the 50 State Agencies and 3 Territories on the revised FNS 759. The training will be designed to highlight the changes in the FNS 759, the reporting requirements, data collection considerations and examples. Training materials are under development and will be submitted to OMB once completed. Training will take place 2 weeks after OMB approval and then annually. Additional training may be provided due to staff turnover or when future significant revisions occur.

**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.**

FNS is committed to complying with the E-Government Act 2002, by providing electronic submissions of information in lieu of paper whenever possible. FNS encourages its State agency partners to offer electronic submission to local agencies whenever it is feasible. FNS estimates that 100% of the State agencies will respond electronically to this data collection using Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>.

**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.**

There is no similar data collection available. 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 solely administers the school meal programs, monitors issuance of SNAP and WIC benefits. Each nutrition assistance program has distinct reporting requirements that are collected electronically through FPRS.

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



There will be no small entities involved with this data collection.

**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.**

FNS will be unable to ensure program integrity and meet its legislative and regulatory reporting requirements for the affected programs.

**7.) Explain any special circumstance that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**

<b>Current OMB Control Number</b>	<b>Program</b>	<b>Worksheet Number and Title</b>	<b>Reason for requiring respondents to report information to the agency more often than quarterly</b>
0584-0002	Child Nutrition Program	FNS-10 Report of School Program Operations	Per the regulation, States shall not receive Program funds to operate for any month for which the final report is not submitted with the time limit (90 days following the last day of the month covered by the report).
0584-0055	Child Nutrition Program	FNS-44 Report of Child and Adult Care Food Program	Per the regulation, States shall not receive Program funds to operate for any month for which the final report is not submitted with the time limit (90 days following the last day of the month covered by the report).
0584-0081	Special Nutrition Assistance Program	FNS-388 State Issuance and Participation Estimates	Part 274.4(b)(4) of the Supplemental Nutrition Assistance Program (SNAP) regulations require State agencies to submit on a monthly basis. Timely State monthly issuance estimates are necessary for FNS to ensure that it remains with the appropriation and will have a direct effect upon the manner in which allotments would be reduced when necessary.
0584-0080	Special Nutrition Assistance Program	FNS-46 Issuance Reconciliation Report	Section 7(d) of the Food and Nutrition Act of 2008, as amended, (the Act) (7 U.S.C. 2016(d)) and Regulations at 7 CFR 274.4(a) and 274.4(b) (2), require State agencies to report on their SNAP benefit issuance operations not less than monthly, through a reconciliation process and to report to FNS using Form FNS-46, Issuance Reconciliation Report. This monthly report is used to account for benefits issued during a report month for each issuance reporting point, and to document the reconciliation process by

			which States compare the total issuance, returns, and unauthorized issuance amounts resulting in the net Federal obligation.
0584-0293	Food Distribution Program	FNS-152 Monthly Distribution of Donated Foods to Family Units	Form is collected electronically monthly to ensure efficient management of the program. Timely ordering, receipts, inventory control, and accounting of commodities and funds are necessary to ensure the programs continue to operate and the funds are spent during the appropriate time periods.
0584-0293	Food Distribution Program	FNS-153 Monthly Report of the CSFP and Quarterly Administrative Financial Status Report	Form is collected electronically monthly to ensure efficient management of the program. Timely ordering, receipts, inventory control, and accounting of commodities and funds are necessary to ensure the programs continue to operate and the funds are spent during the appropriate time periods.
0584-0045	Special Supplemental Food Program for Women, Infants and Children (WIC)	FNS-798 WIC Financial Management and Participation Report	Monthly reporting is critical for monitoring each State agency's expenditures to ensure it does not overspend its authorized grant, which would create a financial burden for the State. Costs incurred by a State agency in excess of its grant must be paid by the State.

- **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 support 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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 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 Notice was published in the Federal Register on August 17, 2015, page 49198, Vol. 80, No.58.

During that time, we requested 86,871 burden hours; now we are requesting 104, 184 burden hours for this overall information collection request.

Unfortunately, the program was not prepared for the multitude of comments and therefore, not ready to submit the revised OMB package for FNS 759. Although the burden for this form remains the same (3,180) this request and 30dayFRN changed the baseline burden estimates previously published in the August 17, 2015.

The increase in burden estimates is solely based on different activities (2 merges and 1 revision) that occur prior to the submission of this request and the reason for the difference in baseline burden estimates published in the 60dayFRN

Fifteen (15) comments were submitted in reference to FNS 759 and have been summarized below.

**Summary of Comments:**

Two State agencies, one Federal agency, ten Implementing agencies and two private citizens submitted a total of sixteen comments during the 60-day public comment period for the proposed

Program Activity Statement information collection request. These comments are available for public inspection at online at [www.regulations.gov](http://www.regulations.gov). In general, comments referenced proposed changes, additions or removals of specific elements in the collection, and requested clarification of form instructions. FNS reviewed all of these comments, and summarized all responses in the following section. Two commenters submitted comments addressing the burden of this proposed revision. FNS responded directly to these comments via the method they were submitted and included them in this submission as attachments.

FNS has estimated two hours for training and has incorporated the training time into the total burden hours.

#### Direct Education

Multiple commenters recommended including definitions and instructions in the area of estimating counts of participants. This has been resolved by providing definitions and improving the instructions provided.

Another commenter asked the type of circumstance under which a count for direct education would be considered an estimate. Additional examples will be provided in the training materials.

Two commenters had concerns regarding the use of the Community Eligibility Provision for calculating participant counts. On further discussion with appropriate experts, this example was removed from the form because reporting will take place on actual participation and not on SNAP status.

Multiple commenters recommended the use of income categories. This recommendation was disregarded in order to reduce the complexity and reporting burden. States will continue to report on SNAP-Ed participation.

Currently, if a participant does not provide information on all five areas of enrollment data, such as name, age, race/ethnicity and SNAP participation status, the contact is reported as an indirect education contact rather than a direct education contact. Commenters' suggested that regardless of the missing information, all contacts receiving direct education should be counted as such. FNS agrees and has updated the instructions and will include this in future training.

One commenter stated that there was no place to identify the direct education curriculum used or the level of evidence for that particular curriculum. This form is not designed to collect this information, as it is captured elsewhere.

Two commenters suggested that in order to achieve consistent reporting across States, FNS provide methods to universally "estimate" counts and circumstances under which "estimated" counts can be made. FNS will cover this topic in future training.

One commenter stated that it is important to consider that to have unduplicated counts for schools/child care centers/out of school time providers, the school year (August/September-May/June) must be used instead of the federal calendar. Given the differences in school calendars between States and within States, FNS will maintain the current reporting period.

### Indirect Education

The original EARS form had an entire question on reporting data on indirect education. This was removed in the version that was made available for comment. Multiple commenters suggested that this was important information to report and is now collected in item 5 of the form.

### Participants and Contacts

One commenter suggested that reporting counts for gender be used only for adults and the 250 word limit be dropped entirely, while another commentator suggested that an additional category such as “transgender” be added, and the 250 word limit for an explanation be increased. FNS has decided to keep the categories as is, but has increased the word limit for the explanation to 500 words.

Per one commenter’s recommendation to streamline the worksheet, FNS merged two questions on Age and gender into one question on age and sex. The term “sex” is used instead of “gender” because gender is considered a social construct, while sex refers to a biological assignment. Using the label “sex” avoids the need to include transgender or other response options.

### Race and Ethnicity

Multiple commenters have stated that the present method of collecting race and ethnicity data does not reflect the true diversity of the SNAP-Ed population, especially because many Latinos do not identify with any of the race categories and simply consider themselves Hispanic or Latino. The comment was that this results in gross underestimation of reach for this population. FNS will continue to collect this information according to current OMB requirements.

Two commenters suggested that an additional row be added to the table for “declined to state, race unknown/did not respond/choose not to answer “since a certain number of participants decline to “self-identify” and educators are not comfortable with assigning a race to participants based on visual estimates. FNS will continue to collect this information according to OMB guidance.

One commenter suggested that since race/ethnicity designations have become increasingly complex and labor intensive to collect, could the data be collected intermittently? This commentator also suggested that the reporting of single or multiple race/ethnic categories be consistent with those of the Bureau of Labor Statistics or the Census Bureau, since these are also used in State needs assessments. FNS will continue to collect this information according to OMB guidance.

### Settings

Two commenters suggested that the listed sites be aligned and categorized by the six domains of Eat, Learn, Work, Live, Play and Shop of the SNAP-Ed Evaluation Framework. FNS concurs and the item was modified to include these categories.

One commenter stated that language should be added to clarify that “setting” should refer to a physical location. FNS concurs and this explanation will be provided in all training materials.

Two commenters suggested adding additional sites for clarity. These new sites were added to the list of existing sites.

#### Social Marketing and Policy, System and Environmental Components (PSE's)

Multiple commenters recommended that information on direct and indirect education be included as part of the social marketing and PSE components. FNS concurs and has incorporated this into item 5 of the form.

Multiple commenters have recommended that additional examples on the way direct and indirect education can overlap with social marketing and PSE interventions be provided. Once developed, FNS will provide any relevant information in training materials.

Multiple commenters provided suggestions on combining questions or modifying language to indicate whether social marketing is used as a means of providing direct education or not used as a means of providing direct education. Item 5 reflects this suggestion.

Multiple commenters suggested that detailed instructions and additional examples be provided to explain “social marketing, part of social marketing, supports social marketing”. Once developed, FNS will provide clarification on this in any relevant training materials that are currently under development.



One commenter recommended that the “programming format data” be dropped. FNS considered this information valuable and decided not to remove it from the form after careful consideration.

#### Policy, Systems and Environmental Change (PSE’s)

Multiple commenters suggested that the term “adopted” assumes that the PSE is fully implemented; however, States may be at different stages of implementation. To address this concern, FNS modified the item to include the various stages from planning to full implementation.

One commenter suggested that not just the number of PSE’s be reported, but whether or not they are listed in the SNAP-Ed Strategies and Interventions Toolkit. This information is captured elsewhere.

Multiple commenters have suggested that capturing accurate PSE data on outcomes and changes at the population level would be challenging. FNS will only collect information on PSE reach at this time through the EARS form and may consider developing an evaluation system to collect more outcomes based data in the future.

Multiple commenters stated that describing PSE activity in 500 words or less was not sufficient. FNS has now provided space for 1000 words.

#### Partnerships

One commenter suggested including a means to report expenses not covered by Federal funding. FNS has determined that this would significantly increase burden and will not collect dollar amounts but a code option is included for whether partners have contributed additional resources through funding.

One commenter suggested that this item be expanded to include not just who the implementing agencies are, but also why (what is the goal or anticipated outcome of the collaboration). This information is already collected as part of the States SNAP-Ed plans.

Multiple commenters asked for clearer instructions on how a partnership should be reported, what constitutes a partnership and the contribution of the partnership. FNS agrees and will provide clarifying information in the training materials that are currently under development.

#### Intervention topics

Multiple commenters suggested that FNS provide clarification in this section. FNS has addressed this through various edits to this part of the form.

#### General Comments

One commenter suggested that the form should collect information on outcomes and not just the process measure of the number of people served. FNS disagrees since this form is not designed to gather outcomes, which are reported elsewhere. FNS will explore improved methods for outcome based reporting in the future.

One commenter recommended that consideration be given to the development of a system such as WebNEERS (Web- Based Nutrition Education Evaluation and Reporting System), that captures impact of the Expanded Food and Nutrition Education Program. FNS is considering the development of such a system in the future, but this form is not designed to collect program outcomes.

One commenter suggested that caution be used when comparing raw cost associated with different delivery methods, especially since direct education methods are more labor intensive than other indirect methods of delivery. FNS will no longer collect cost data in this form.

#### Burden Hours

Two commenters suggested that the burden hours were insufficient. FNS has increased the burden hours from 2,808 hours to the current 3,180 hours. FNS has drafted individual responses to be sent to the commentators on 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 form, and on the data elements to be recorded, disclosed, or reported.**

FNS discussed the form revision with the Regional Coordinators.

**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 offered 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 will comply with the Privacy Act of 1974. No individual or household data is collected nor maintained in this system. State Agencies are assigned codes by FNS as an identifier for States only no personal information from individuals. The data will be collected in aggregate form and respondents will not be identified individually.

A Privacy Impact Assessment was conducted in June 2007 on the FPRS (attachment) which determine FNS does not need to publish a SORN.

**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.**

No sensitive questions will be asked in this data collection.

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

**A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden the 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.**

The requested burden hours associated with this collection and the cost to respondents, are shown in the attached burden chart. Time estimates include the time needed to look up data or copy recorded information and submit it to FNS. There is no recordkeeping burden associated with this data collection. Once these reporting burden hours have been approved by OMB, the agency will discontinue those information collections that would be considered duplicative in nature. However, there is recordkeeping involved with many of the existing FNS forms/worksheets identified in this request. Any recordkeeping burden hours will remain with those existing collections. Lastly, there is no recordkeeping for the FNS-759 and OMB Control # 0584-0542, expiration date: 8/31/2016 will be discontinued.

The current overall burden inventory for FPRS is 104,184 burden hours and 46, 216 responses annually. The current burden hours report for FNS 759 is 2,808 annual burden hours. This revised request for FNS 759 will add 372 burden hours for a revised burden estimate of 3,180 burden hours for this specific reporting activity for FNS 759 and no additional responses for a revised FPRS burden inventory of 104,556 burden hours and the responses remains unchanged with this revision.

FNS will provide a one-time, two hour training to one representative from each of the 50 State Agencies and 3 Territories on the revised FNS 759 to a total of 53 individuals.

**Table A.12-1 FPRS Reporting Estimates + Revised FNS 759 increase in time per respondent:**

<b>FPRS 0584-0594 CURRENT Annual Time Burden (Hr)</b>	<b>FPRS 0584-0594 Revised FNS 759 Annual Time Burden (Hr)</b>	<b>Grand Total Burden Hours</b>	<b>FPRS 0584-0594 CURRENT Total Annual Response</b>	<b>FPRS 0584-0594 FNS 759 Total Annual Response</b>
104,184.00	3,180.00	104,556.00	46,216	remains unchanged once annually

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

The estimate of respondent cost for the FNS-759 is based on the burden estimates developed in 12(A) above. Based on the Bureau of Labor Statistics May 2014 Occupational and Wage Statistics – 13-0231 (<http://www.bls.gov/oes/current/oes132031.htm>), hourly mean wage for budget analyst functions performed by State and local agency staff are valued at \$27.62 per staff hour. Annual respondent cost prior to federal cost sharing is estimated at \$65,945.

**13.) Provide estimates of the total annual cost burden to respondents or record keepers 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.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

**14.) Provide estimates of annualized costs 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.**

It is estimated that the current annualized cost of the FPRS system to the Federal government is \$9,222,126.51. This includes contract cost of \$2,334,991 which includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items.

This information collection also assumes that a total of 20 hours of Federal employee time: for labor, analyzing, evaluating, summarizing and reporting on this information collected: GS-14, step 5 Branch Chief at \$57,70 per hour for a total of \$1,154 and GS-13, step 5 Program Analyst at 100 hours for this of \$4,883 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2014.)

FNS program specific staff developed the form instructions and related policies for the State agencies and will compile the resulting data to ensure compliance with regulations.

Estimated costs are provided in Table A14.1 for the expenses that would not have been incurred without this collection of information.

**Table A.14 - 2 Cost to the Federal Government**

Currently OMB approved information collection packages			Cost to Federal Government (Reports submitted by SA and Analyzed by HQ or Regional Staff) No ICR drafting Cost in this table	
OMB Control Number	Worksheet/Form number	Expiration Date	Headquarter or Regional Staff Grade	Total Federal Cost (no ICR drafting cost for Program)
<b>Child Nutrition Program</b>				
0584-0002	FNS-10	6/30/2017	GS-12 Step 6	\$ 3,215.20
0584-0075	FNS-13	6/30/2017	GS-12 Step 6	\$ 3,348.00
0584-0280	FNS-418	3/31/2016	GS-12 Step 5	\$ 312,000.00
0584-0055	FNS-44	9/30/2016	GS-12 Step 5	\$ 2,270,613.00
0584-0067	FNS-777	5/31/2016	GS-12 Step 5	\$ 7,281.90
0348-0061	SF-425	2/28/2015	GS-12 Step 5	\$ -
<b>Special Nutrition Assistance Program</b>				
0584-0025	FNS-101	6/30/2017	GS-12 Step 5	\$ 114,035.00
0584-0069	FNS-209	6/30/2017	GS-12 Step 5	\$ 193,533.00
0584-0594	FNS-366A & FNS-366B	4/30/2017	GS-12 Step 5	\$ 635,721.00
0584-0081	FNS-388 & FNS-388A	3/31/2017	GS-12 Step 5	\$ 127,722.00
0584-0594	FNS-778 & FNS-778A	6/30/2017	GS-12 Step 5	\$ 3,348.00
0584-0339	FNS-583	6/30/2017	GS-12 Step 5	\$ 902.46
0584-0037	FNS-292A&B	6/30/2017	GS-12 Step 5	\$ 1,733,185.00
0584-0080	FNS-46	6/30/2017	GS-12 Step 5	\$ 23,185.44
0584-0542	FNS-759	8/31/2016	GS-12 Step 5	\$ 25,000.00
<b>Food Distribution Programs</b>				
0584-0293	FNS-667, FNS-152, FNS-153, & FNS-667	6/30/2017	GS-12 Step 5	\$ 595,427.00
0584-0025	FNS-191 & FNS-101	6/30/2017	GS-12 Step 5	\$ -
0348-0061	SF-425	6/30/2017	GS-12 Step 5	\$ -
<b>Special Supplemental Food Program for Women, Infants and Children (WIC)</b>				
0584-0447	FNS-683 & FNS-203	6/30/2017	GS-12 Step 5	\$ 138,892.80
0584-0541	FNS-683A	5/31/2016	GS-12 Step 5	\$ 561,000.00
0584-0431	FNS-648	6/30/2017	GS-12 Step 5	\$ 1,491.21
0584-0045	FNS-798 & FNS-798A	6/30/2017	GS-12 Step 5	\$16,082.50
0348-0061	SF-425	2/28/2015	GS-12 Step 5	\$ -
<b>Grants Management</b>				
0348-0061	SF-425	2/28/2015	GS-12 Step 5	\$ -
<b>Sub Total Estimated Total Annual Cost to Federal Government</b>				<b>\$ 6,881,098.51</b>
<b>Estimated Total Contract Cost to Federal Government to maintain FPRS</b>				<b>\$ 2,334,991.00</b>
<b>Estimated Total Draft ICR for FPRS</b>				<b>\$ 6,037.00</b>
<b>Grand Total Estimates for this ICR Cost to Federal Government</b>				<b>\$ 9,222,126.51</b>

<sup>1</sup>Hourly rate for GS-12/Step5 and 12/6 staff; <sup>2</sup>Hourly rate for GS-13/Step 5 staff and 14/Step 5 Branch Chief

Criteria Used: Estimates includes Cost for Regional and Headquarter Federal Program Staff to analyze data reported on each FNS forms/worksheets by States. Includes cost for staff to develop policy guidance for forms, includes contract cost to develop and maintain FPRS website, create, print, warehouse or distribute any paper forms if applicable.

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



The current overall burden inventory for FPRS is 104,184 burden hours and 46, 216 responses annually. This request will add 372 burden hours and no additional responses for a revised burden inventory of 104,556 burden hours and the responses remains unchanged with this revision.

The current burden reported for worksheet FNS 759 is 2,808. The revised requested burden to use the FNS 759 is 3,180.00 an increase of 372 hours due to program changes. In the original approval FNS indicated there were 52 State Agencies (SA). In 2014 Guam began participating in the SNAP-Ed program thereby, increasing in the number of responses from 52 to 53 SA's since the last approval. Under this revision, fifty-three (53) SA's submit 1 response annually for a total of 53 annual responses. The annual reporting burden for the form FNS-759 revision is 53 hours per respondent to complete the form. We are requesting to increase the time per response to 60 hours per respondent. This is an increase of seven (7) burden hours per response from the currently approved time per response. The reporting burden for form FNS-759 is 3,180 hours (53SA × 1 annual report = 53 total annual responses × 60 hours per response = 3,180).

**16.) For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans to publish a compilation of the data from this information collection. Data collected will be used for internal administration of contracts.

The data is gathered at various times, ranging from monthly, quarterly, annual or final submissions. The information may also be used by FNS to conduct program evaluation, planning and audits, future funding, research, and general statistics.

The data compiled is used by the FNS administrator, the Program’s Division, FNS Financial Management Division and State Agencies administering FNS Programs to ensure program integrity and compliance. This information is also used to determine eligibility to participate in these programs, ensure acceptance of responsibility in managing an effective food service program, implement systems for appropriating Program funds, and ensure compliance with all statutory and regulatory requirements.

Additionally, FNS uses the data reported on the FNS-778 worksheet to monitor the actual cost of each function against budgeted amounts approved for each State agency. FNS also uses the data to ensure that the Federal rate of reimbursement is appropriate for each function and that the State agency has met its matching requirement. FNS uses the reported data on the FNS 778A to monitor the actual benefit cost for these projects in each State agency along with participation trends. FNS also uses the data to look at both total costs and cost per case. The actual cost data (along with participation trends) helps us to estimate, budget, and set funding levels for these costs for the upcoming fiscal year.

<b>A.16 - 1 Project Time Schedule</b>	
<b>Activity</b>	<b>FPRS Time Schedule</b>
Completed Reports in FPRS	4 months after OMB approval and quarterly thereafter
Validation	10 - 12 months after OMB approval and quarterly thereafter
Analyses	12 - 18 months after OMB approval and quarterly thereafter
Publication	No publication of reports

**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.**

FNS plans to display the OMB approval number and the expiration date on this information collection.

**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.