

**SUPPORTING STATEMENT FOR  
“SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND TRAINING  
PROGRAM ACTIVITY REPORT (FNS-583)”**

**OMB No. 0584-0339**

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**ATTACHMENTS:**

ATTACHMENT A: Legal Authority

ATTACHMENT B: FNS-583 SNAP Employment and Training (E&T) Program Activity Report.

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ATTACHMENT D: FPRS Public Burden Statement, OMB# and Expiration Date for FPRS

**TERMS OF CLEARANCE:** Previous terms and conditions for the information collection is approved. These terms extended only to the instrument contained in the collection (FNS-583.pdf). Collection by other means, i.e., through the Food Program Reporting System (FPRS) was not requested nor were the instruments included. Any collection via these means is not approved and is being conducted in violation of the Paperwork Reduction Act. Approval is only given for 12 months. During those 12 months, an ICR should be submitted for the Food Program Reporting System that will incorporate the submission of information associated with this collection.

**FNS RESPONSE TO TERMS OF CLEARANCE:** In Feb 2014, FNS added 21,849 reporting burden hours and 646 total annual responses to FPRS associated with FNS 583. However, FNS didn't removed the 21,849 reporting burden hours from this collection which is considered a duplication of burden hours. We are decreasing the 21,849 reporting burden hours with this submission. The primary burden on the FNS 583 is cleared under OMB Control No.: 0584-0594, Expiration Date: 06/30/2019 and we are not seeking any reporting burden for this form. The only burden accounted for is (31.50) recordkeeping burden as well as (18 burden hours) for request for additional funds in this revision. The FNS 583 is used as a source document which is maintained by States.

## **Part A. Justification**

**A. 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 collection for recordkeeping of the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program Activity Report (form FNS-583) and preparation of State requests for additional funding only. The actual request for additional E&T funds is in no specific format and is emailed to the FNS Regional Office. The Employment and Training Program administered by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), plays an important role in ensuring as a condition of eligibility, that each non-exempt SNAP household member age 16 to 59 be work registered by

the State agency at the time of application and once every twelve months thereafter in compliance of Section 6(d) of the Food and Nutrition Act of 2008 and SNAP regulations at 7 CFR 273.7.

**A. 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.**

In accordance with Section 6(d) of the Act and 7 CFR 273.7(c)(9),(10), and (11), State agencies must maintain data that is submitted on quarterly reports about their E&T Programs so that the Department can monitor State performance.

In accordance with Section 16(h)(1)(C) of the Act and 7 CFR 273.7(d)(1)(i)(D), State agencies interested in additional 100 percent funding that exceeds the formula grant allocation must submit requests to FNS in writing. Requests are submitted via email to the appropriate FNS Regional Office. FNS allocates funding to meet all or some of a State agency's request as it considers appropriate and equitable.

All data reported on the (FNS-583) by State agencies submit data using the electronic Food Programs Reporting System (FPRS), which is approved separately under OMB No. 0584-0594, expiration date 09/30/2019; we are not seeking any reporting burden for FNS 583 in this request. The data maintained helps FNS make supplemental funding decisions throughout the Federal fiscal year. FNS also uses to report on program activities for Congress and shares data with the members of the general public when requested.

**A. 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.**

This information collection complies with the E-Government Act of 2002. There are no electronic submissions per OMB requirements, for the collection to request for additional funds or maintain this form FNS 583.

State agencies submit requests for additional funds via email to FNS Regional Offices at any time. There is no form required for these requests. Requests for additional funds are typically submitted on State agency letterhead with details about the nature of the request and the proposed use of additional funds.

**A. 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 are no similar data collection efforts. FNS solely monitors State E&T program performance to ensure integrity. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State agency administrative reporting requirements and special studies by other government and private agencies.

The information required for FNS-583 is currently reported and collected in FPRS under OMB Control No.: 0584-0594, Expiration Date 6/30/2019; therefore, FNS is only requesting recordkeeping burden for this activity used for FNS 583 in order to avoid duplication.

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

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Information being requested or required has been held to the minimum required for the intended use. Although 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 agency. Thus, they maintain the same kinds of information on file. There are no small entities associated with this information collection.

**A. 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.**

If State agencies were not required to maintain records supporting FNS-583 submissions, FNS would not be able to adequately monitor and audit State data to verify that submissions are accurate and reflective of federally funded services. Moreover, State agency must keep records on the number of exemptions issued to able-bodied adults subject to a time limit and report this on the FNS-583. If FNS could not monitor State

agencies' quarterly exemption data and verify these records, FNS could not ensure that exemptions do not exceed the number authorized.

If FNS could not maintain request for additional funding, it would be unable to make financial adjustments in accordance with the statute based on historical information.

FNS must monitor State agency E&T program performance to ensure that the Program is being efficiently and economically operated. If unable to maintain the data necessary to oversee program operations, FNS could not fulfill this mandate, nor could it initiate audits timely or recommend effective corrective measures to ensure successful State agency program operations.

**A. 7 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.

**A. 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.**

**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.**

On April 10, 2017, FNS published the notice in the *Federal Register* (FR) Volume 82, Page 17180. No public comments were received via the Regulations.gov site or via email.

The burden published in the FR was incorrect. FNS is taking this opportunity to clarify that the reporting hours for the FNS-583 included in the published notice should have been excluded from the notice and will be excluded from this information collection burden request. The reporting hours for the FNS-583 are included in the burden estimates for FPRS (OMB No. 0584-0594, expiration date 06/30/2019). To avoid duplication, FNS is removing those hours from this package.

**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.**

Every three years each State agency has an opportunity to comment on the notice which is sent out to State agencies and posted on FNS website.

**A. 9 Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gifts were provided to any respondent.

**A. 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 private information is associated with this information collection.



**A. 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 sensitive questions involved in this information collection.

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

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

The total burden for activities in this revision is 49.51 (rounded up to 50 total annual burden hours and 248 responses. This collection includes only the reporting burden for additional funds requests submit to FNS via email and recordkeeping burden for the FNS-583 instrument. Again, the reporting burden for the form FNS-583 is included in the approved FPRS burden (OMB No. 0584-0594, expiration date 06/30/2019.).

#### **ESTIMATED ANNUAL REPORTING BURDEN HOURS**

A. Requests for additional E&T funds: Under 7 CFR 273.7(d)(1)(i)(F) State agencies may request additional E&T funds if needed after initial allocations are made. FNS will reallocate available funds (e.g. funds that are unallocated or funds that are allocated but will not be spent) in a fair and equitable manner. FNS estimates that out of 53 State agencies approximately 18 State agencies per year request additional funds. FNS estimates it takes one hour for a State agency to prepare a request for additional funds.

- **The estimated total annual burden for preparing requests for additional funds is 18 hours.**  
*(Approximately 18 State requests submits x 1 request for additionally funds annually = 18 total annual responses/request x 1hour per request x = 18 hours per year).*

## ESTIMATED TOTAL RECORDKEEPING BURDEN HOURS

B. *Retention and Custody of Records.* Under 7 CFR 277.12 (1) and (2) All financial records, supporting documents, statistical records, negotiated contracts, and all other records pertinent to program funds shall be maintained for three years from the date of submission of the annual financial status report or if any litigation, claim, or audit is started before the expiration of the three-year period, the applicable records shall be retained until these have been resolved.

- **7 CFR 277.12 - The total annual recordkeeping burden for requesting FNS 583 E&T funds is approximately 29.04 hours (53 State agencies x 4 annual records = total of 212 total annual records x 0.137 hours per record = 29.04 estimated annual burden hours.)**
- **7 CFR 277.12 - The total annual recordkeeping burden for requesting additional E&T funds is approximately 2.47 hours (18 State agencies x 1 annual records = 18 total estimated annual records x 0.137 hours per record = 2.47 burden hours. )**

*The total annual recordkeeping burden is 31.51 hours ((212 FNS-583 reports + 18 requests for additional funds = 230) x 0.137 = 31.51 hours).*

*The combined total annual reporting and recordkeeping burden is 49.51 hours (18 reporting + 31.51 recordkeeping) and 248 total annual responses (18 reporting submitted + 230 recordkeeping responses).*

**Table A.12.1 – Reporting Estimates of Hours Burden**  
**SNAP EMPLOYMENT AND TRAINING PROGRAM ACTIVITY REPORT**  
**REQUESTS FOR MORE FUNDING**  
**AND RECORDKEEPING FOR THE FNS-583**

SECTION OF REGULATION	TITLE	NUMBER OF RESPONDENTS	REPORTS FILED ANNUALLY	TOTAL RESPONSES (C x D)	ESTIMATED NUMBER OF HOURS PER RESPONSE	ESTIMATED TOTAL HOURS (C x D x F)
A	B	C	D	E	F	G
<b>REPORTING</b>						
7 CFR 273.7(d)(1) (i)(F)	Preparing requests for more funds after initial allocation	18	1	18	1	18
<b>Total Reporting Additional Funds Requests</b>		<b>18</b>	<b>1</b>	<b>18</b>	<b>1</b>	<b>18</b>
<b>RECORDKEEPING</b>						
7 CFR 277.12	Recordkeeping burden for FNS-583	53	4	212	0.137	29.04
7 CFR 277.12	Record-keeping burden for additional requests	18	1	18	0.137	2.47
<b>Total Recordkeeping Burden for FNS 583 and Additional Funds Requests</b>		<b>53</b>	<b>4.34</b>	<b>230</b>	<b>0.137</b>	<b>31.51</b>
<b>SUMMARY</b>						
	<b>TOTAL ALL BURDENS</b>	<b>53</b>	<b>4.679</b>	<b>248</b>	<b>0.199</b>	<b>49.51</b>

**A.12.2 Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

We anticipate that the information collection requirements described in this submission will be performed by administrative type staff at the State agency level. According to the Bureau of Labor and Statistics (<http://data.bls.gov/oes>), the mean hourly wage of State Office and Administrative Support Workers is \$17.91 per burden hour. The total cost is subsequently reimbursed to State agencies through their 100 percent Federal E&T allocations.

## ESTIMATED ANNUAL COST TO STATE AGENCIES

<i>Preparing FNS-583 report</i>	\$ 520.11 (29.04 hours x \$17.91 per hour = \$520.11)
<i>Preparing request for more funds</i>	\$ 322.38 (18 hours x \$17.91 per hour = \$322.38)
<b>Total Annual Cost to State Agencies</b>	<hr style="width: 20%; margin-left: auto; margin-right: 0;"/> <b>\$842.49</b>

**A. 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 is no capital/startup or ongoing operation/maintenance costs associated with this information collection.

**A. 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 annual estimated cost to the Federal government for the FNS-583 information collection and fund request is **\$3,444.97**. FNS has calculated the costs as follows.

Using the 2017 GS Salary Table, we estimate it took 20 hours for a GS-13 (step 1) to prepare the 60-day Notice, and complete the ICR package, for a total of **\$908.40** (20 hours x \$45.42 an hour = \$908.40).

Once the GS-13-1 completed the two documents, they were reviewed and cleared by appropriate FNS officials. We used a GS-14, step 1, as the average hourly salary for these reviewing officials. We estimate it took four reviewing officials 4 hours to clear the 60-day Notice and the ICR package for a total of **\$858.88** (4 hours x \$53.68 an hour x 4 staff = \$858.88).

It cost **\$736** to publish the 60-day Notice in the Federal Register.

We estimate that it takes 1 hour for a GS-13, step 1, to prepare the electronic file and submit to the agency webmaster, a GS 14, step 1, who converts to the file to an Internet friendly format and posts the form to the

Internet. Total cost is **\$99.20** (( $\$45.42 \text{ an hour} \times 1 = \$45.42$ ) + ( $\$53.68 \text{ an hour} \times 1 = \$53.68$ ) =  $\$45.42 + \$53.68 = \$99.20$ ).

**$\$908.40 \text{ Salary} + \$858.88 \text{ Salary} + \$736 \text{ publishing costs} + \$99.20 \text{ Salary} = \$2,602.48 \text{ one-time cost.}$**

The cost to the Federal government includes the annual costs to State agencies for the record keeping and preparation of requests for additional funds, as State agency costs are ultimately reimbursements with federal funds at 100 percent or at 50 percent, based on how the State uses its federal funds for SNAP E&T.

**Therefore, the total cost to the Federal government is:  $\$3,444.97$  ( $\$2,602.48$  in one-time costs +  $\$842.49$  in State reimbursements).**

**A. 15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a revision of a currently approved information collection. The current burden is 21,899 hours and we are reducing burden hours to 50. This reflects a decrease in burden hours from the current approval of -21,849 due to program changes. The current total annual responses 924 and this request is total annual responses is 248 a -676 due to program changes. Unfortunately, FNS didn't removed the 21,849 reporting burden hours or the 676 total annual responses associate with FNS 583 from this collection which is considered a duplication of burden hours.

**A. 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.

**A. 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.

**A. 18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."**

The agency is able to certify compliance with all provisions under Item 19 of form OMB-83-1.