

**SUPPORTING STATEMENT for**

**OMB Control Number 0584-0037:**

**REPORT OF COMMODITY DISTRIBUTION FOR DISASTER RELIEF (FNS-292-A)**

**AND REPORT OF DISASTER SUPPLEMENTAL NUTRITION ASSISTANCE**

**PROGRAM BENEFIT ISSUANCE (FNS-292-A AND FNS-292-B)**

**RECORDKEEPING BURDEN ONLY**

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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 an extension of a currently approved information collection. Under Section 32 of the Act of August 24, 1935 (7 U.S.C. 612c), as amended; Section 416 of the Food and Agriculture Act of 1949 (7 U.S.C. 1431), as amended; Section 709 of the Food and Agriculture Act of 1965 (7 U.S.C. 1446a-1), as amended; Section 4(a) of the Agriculture and Consumer Protection Act of 1973 (7 U.S.C. 612c note), as amended; and by Sections 412 and 413 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5179, 5180), State distributing agencies may release commodity or donated foods procured by the United States Department of Agriculture (USDA) to disaster organizations to provide nutritional assistance to disaster victims. Under the Code of Federal Regulations (CFR) at 7 CFR 250.69(f), State distributing agencies shall provide a summary report to the Food and Nutrition Service (FNS) within 45 days following termination of the disaster assistance, and maintain records of these reports and other information relating to disasters.

The Disaster Supplemental Nutrition Assistance Program (D-SNAP) is a separate program from the Supplemental Nutrition Assistance Program (SNAP) and is authorized by Sections 402 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) and the temporary emergency provisions contained in Section 5 of the Food and Nutrition Act of 2008. State agencies may operate a D-SNAP to address the temporary food needs of applicants in an affected area of a State that has received a Presidential declaration of Major

Disaster with Individual Assistance. The State agency must submit its final FNS-292B to FNS within 45 days of terminating D-SNAP operations, and maintain records of this report.

## **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.**

This information collection pertains only to the recordkeeping burden associated with forms FNS-292A, *Report of Commodity Distribution for Disaster Relief*, and FNS-292B, *Report of Disaster Supplemental Nutrition Assistance Benefit Issuance*. The reporting burden associated with these forms is approved under OMB No. 0584-0594 (Food Program Reporting System; expiration date: 09/30/2019).

FNS utilizes forms FNS-292A and FNS-292B to collect information not otherwise available on the extent of FNS-funded disaster relief operations. Form FNS-292A is used by State distributing agencies to provide a summary report to FNS following of disaster commodity food assistance and to request replacement of commodity foods distributed during the disaster or situation of distress. Form FNS-292B is used by State agencies to report to FNS the number of households and persons certified for D-SNAP benefits as well as the value of benefits issued.

Information collected on Form 292-A and 292-B will be used by the FNS Administrator, the Food Distribution Division, and SNAP to monitor program activity, assess coverage provided to needy recipients, assure the validity of requested commodity reimbursements and to prepare budget requests. Data from Form 292-A and 292-B has been used in the past to report to the

Secretary of Agriculture, the Federal Emergency Management Agency, the White House and Congress on FNS disaster relief efforts.

### **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.**

In accordance with the E-Government Act of 2002 (E-Gov), FNS has reviewed the process for collecting information via Form 292-A and 292-B and will provide electronic submission of these forms with an alternative for paper submission, if needed.

Agencies will collect information using an electronic version of Form 292-A and 292-B that can be submitted using the Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov>. All State agencies have the technological capacity to support electronic submissions. State education and welfare agencies that administer FNS nutrition assistance programs will provide the information which is collected only once per disaster per State. The frequency of collection and the recordkeeping procedures have not changed since the previous collection was approved.

### **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.**

There is no similar information available. The information required for Forms FNS-292-A and FNS 292-B is not currently maintained in any other entity outside of FNS. 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.

**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.**

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. Circumstances limit the flexibility in modifying the recordkeeping requirements. Although smaller State agencies are involved in this data collection effort, they maintain the same program benefits and perform the same function as any other State agency. There are no small entities associated with this information collection.

**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 recordkeeping of this data is done only after a disaster situation has occurred and these records are maintained by the State Agencies. However, if information collection was not collected in the period following each disaster program, FNS would be unable to monitor the issuance of SNAP benefits and the distribution of surplus foods during disaster situations, ensure integrity and reimburse States appropriately for their disaster relief efforts. In addition, FNS would be unable to respond to White House, Congressional, and outside requests to accurately quantify disaster relief provided by FNS.

#### **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.**

FNS published a notice soliciting comments regarding this information collection on April 12, 2017, in the Federal Register at 82 FR 17627. No comments were received.

**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 seeks out consultation on the practical utility, frequency, and time per response on the reporting and recordkeeping with stakeholders three times during the 60dayFRN, the 30dayFRN for this and during the FPRS renewal for that information collection request where the reporting burden is maintained for DSNAP FNS 292 A and 292 B. There was no other attempted to seek outside consultation for the recordkeeping burden for this information collection.

**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.**

There are no plans to provide any 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.**

FNS does not offer any assurance of confidentiality to the respondents.

**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.**

Form 292-A and 292-B contain no questions of a sensitive nature.

**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.**

**Reporting Burden:**

There is no additional reporting burden associated with this information collection. The reporting burden associated with these forms is approved under OMB No. 0584-0594 (Food Program Reporting System; expiration date: 09/30/2019).

**Record Keeping Burden:**

While, the number of disasters that occur annually cannot be predicted, FNS estimates that 55 State distributing agencies will maintain 1 record of a FNS-292A annually, and that a maximum of 53 State agencies will maintain 1 record for FNS-292B annually, for a total of 108 records annually. The time needed to maintain each record is 5 minutes (.084 hours). The total burden to maintain these records annually is 9 hours, which is unchanged from the previous submission.

Recordkeeping Activity	# of Recordkeepers	Frequency of Record maintained per SA	Total Annual Records	Annual Hours per Recordkeeper	Total Annual Recordkeeping Hours
Maintain FNS-292A – Report of Commodity Distribution for Disaster Relief	55	1	55	0.084	4.62
Maintain FNS-292B – Report of D-SNAP Benefit Issuance	53	1	53	0.084	4.45
<b>Total Record Keeping Burden</b>	-	-	108	-	9.24

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

Respondents and record keepers involved in this collection will be managers at State Departments of Social Services, which corresponds to the Bureau of Labor Statistics Category 11-9151, Social and Community Service Managers. Based on the most recent Occupational Employment and Wage Estimates from July 2017<sup>1</sup>, workers in this category employed by State Governments earn an hourly mean wage of \$34.07. FNS estimates that this information collection will result in an initial cost for respondents of \$309 (9.24 burden hours multiplied by \$34.07); however, final costs are estimated at \$154.50 after 50 percent of the administrative costs incurred by State agencies are reimbursed by FNS.

<sup>1</sup>[https://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](https://www.bls.gov/oes/current/oes_nat.htm#11-0000)

**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 or ongoing operation/maintenance costs associated with this information collection.

**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.**

Using the 2017 Federal Wage Rate, FNS estimates the annualized cost for the recordkeeping burden to be \$1,394.03. The Federal cost includes employee labor for analyzing, evaluating, and summarizing information from records in this collection (for form FNS 292A, 15 minutes per record x 55 annual responses = 13.75 hours) and (for form FNS 292B, 15 minutes per record x 53 annual responses = 13.25 hours) by a FNS Program Analyst (GS-13, Step 1), as well as the cost associated with the preparation of this information collection package (6 hours) by a FNS Program Analyst (GS-13 Step 1). Additionally, it will take the program Branch Chief (GS 14 Step 1) approximately 1 hour to review this information collection request for clearance for an hourly rate of \$42.23. FNS reimbursed State agencies after 50 percent of the administrative costs has incurred for this activity there is \$154.50 reimburse to the States.

Activity	Hours	Hourly Wage Rate <sup>2</sup>	Cost
Review of 292-A	13.75	\$35.74	\$491.43
Review of 292-B	13.75	\$35.74	\$491.43
Branch Chief Review of information collection package	1.00	\$42.23	\$42.23
Preparation of information collection package	6	\$35.74	\$214.44
FNS cost to reimburse States for this activity	-	-	\$154.50
<b>Total</b>	<b>33.5</b>	<b>-</b>	<b>\$1,394.03</b>

**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 an extension of a currently approved information collection. The burden hours remains the same. While *FNS-292A – Report of Commodity Distribution for Disaster Relief* has 55 State agencies, in the previous submission, FNS incorrectly estimated that up to 55 State agencies would maintain annual records of the *FNS-292B: Report of D-SNAP Benefit Issuance*. However, there are only 53 State agencies allowed to operate a D-SNAP with FNS approval (50 States, the District of Columbia, the U.S. Virgin Islands and Guam). FNS has decreased the total number of recordkeepers for FNS-292B from 55 to 53 to correct this error. While this adjustment decreases the total number of recordkeepers for this collection, there is no impact on the currently approved burden hours.

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<sup>2</sup>[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf)

**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.**

There are no plans to publish statistical analyses.

**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.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

**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.