

**Supporting Statement for Paperwork Reduction Act
Supplemental Nutrition Assistance Program (SNAP)**

Justification for Adding

Employment and Training (E&T) Data and Technical Assistance (DATA) Grants to

List of Approved Programs Using Uniform Grant Application for

Non-Entitlement Discretionary Grants,

OMB Control Number 0584-0512

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.

The United States Department of Agriculture Food and Nutrition Service (USDA FNS) oversees the State administration of the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) programs. The Agricultural Act of 2014 established outcome reporting measures for SNAP E&T programs. Starting in fiscal year (FY) 2017, State agencies will be required to submit annual reports on E&T program outcomes, including employment, earnings and retention. The first annual reports are due on January 1, 2018. USDA FNS hereby announces the availability of funds and an opportunity to support the development of State SNAP E&T data collection and reporting systems. The authority for this grant announcement is contained in Division A of the Consolidated Appropriations Act, 2017 (P.L. 115-31).

The purpose of this announcement, therefore, is to describe the new opportunity and solicit proposals to support these aims. In order to select the most appropriate grantees, a

competitive request for applications is necessary. This solicitation is open only to State, local, or Tribal government organizations that administer SNAP. Eligible entities will prepare an application.

FNS will post the Request for Application (RFA) package for the *SNAP E&T Data and Technical Assistance (DATA) Grants* on its website one (1) day after OMB clearance at <http://www.fns.usda.gov/cnd> and on www.grants.gov.

2. 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.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant and recommend the applicant most likely to meet program objectives and most responsive to the solicitation. The selection criteria are contained in the RFA package. This process will occur only once during fiscal year 2017.

The following forms are required of grant applicants. They are located at

http://www.grants.gov/agencies/aforms_repository_information.jsp: Click Active Forms.

- (A) Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF-424)
 2. Budget Information and Instruction (SF-424A)
 3. Assurance-Non-Construction Programs (SF-424B)
- SF LLL (Disclosure of Lobbying Activities)

The required OMB form can be obtained at the following website:
<http://www.whitehouse.gov/sites/default/files/omb/grants/sflllin.pdf>.

In addition, the applicant must submit the following Departmental Forms:

In lieu of submitting AD-1047 and 1048, users will adhere to the Terms and Conditions to follow these regulations.

- AD-1047 Certification Regarding Debarment, Suspension
- AD-1048 Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transactions
- AD-1049 Certificate Regarding Drug Free Workplace Requirements Alternative 1
(Note that there is a version of this form for Individuals: AD-1050 and a version for State Agencies: AD-1052)
- AD 3030 Representations Regarding Felony Conviction and Tax Delinquent Status for Corporate

These forms are at the USDA Forms site: <http://www.ocio.usda.gov/policy-directives-records-forms/forms-management/approved-computer-generated-forms>.

Grantees will be required to submit the following:

- Quarterly Federal Financial Report (SF-425)
- Quarterly Progress Report (there is no specific form however, on pages 2-3 of the Terms and Conditions there are criteria for the quarterly progress report which provides instructions on what must be included in the report)

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.

In compliance with the E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the

application from the www.grants.gov website. All applicants will apply for this opportunity directly through www.grants.gov. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will report quarterly financial data on the SF-425 electronically through FNS' Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx> approved under OMB#0584-0594 Expiration Date 6/30/2019. Furthermore, FNS estimates approximately 100% of the entire collection will be collected electronically.

4. 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 data collection effort available. This program solicitation is new and unique. Every effort has been made to avoid duplication. FNS will solely monitor the SNAP E&T DATA grants. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies.

5. 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.

The information requested is held to the minimum amount required. This grant is only open to State agencies that administer SNAP. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small

entities. Grantees may sub award, by contract or sub grant, tasks to other organizations; however, only businesses (non-profit organizations or for-profit organizations) with extensive experience in employment, training, and education outcome reporting or data analysis.

We do not anticipate any small business responding to this data collection. FNS anticipates there are no small business involved with this data collection. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities since eligible applicants for this RFA is limited to State agencies that administer SNAP.

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.

This is a voluntary, one-time grant opportunity which will be awarded to three to nine State or local SNAP agencies. FNS reserves the right to initiate a second competitive process if it receives few applications of technical merit through this RFA. FNS will seek minimal information that will be critical in selecting the most promising grantees. This includes information of applicant's project design, budget appropriateness and economic efficiency, organizational experience and capacity, and implementation and evaluation of the project. The consequence for not collecting the information is the inability to establish which proposals meet program objectives.

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.

8. 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.

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.

A 60-day notice was published in the Federal Register on November 23, 2015 (Volume 80, Number 42, page 72945) soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package.

FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

There are no plans to provide cash payments or gifts to respondents.

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

Provision of the application information requested is entirely voluntarily. This information will be used within FNS and may be disclosed to anyone outside FNS as permitted by the Privacy Act, except as required by law under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement respect the existing policy with regard to privacy. FNS will work with the grantee(s) and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act that requires the grantee(s) to release permission and is informed of the use of the information.

The grantee(s) awarded a grant under this RFA will be required to submit the SF-425 forms. All of the SF-425 forms are stored in a secured database. Therefore, grantee(s) must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business

with the Food and Nutrition Service. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases.

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 data collection.

12. 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.

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

Out of 53 eligible SNAP State agencies, FNS estimates that approximately fifteen (15) responses from State government agencies for the *SNAP E&T DATA grants*. It is estimated that the average applicant will spend 40 hours developing their proposal, see pre-award burden estimates below. Out of the 15 State agencies who will submit a proposal, FNS estimates awarding funding to 5 (five) Grantees see post-award reporting and recordkeeping burden estimates below.

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Annual Burden

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
State agencies that administer SNAP	15	1	15	40	600
Total Burden	15	1	15	40	600

Pre-Award Annual Burden Summary:

Number of Respondents: 15

Responses per respondent: 1

Total Annual Response: 15

Hours per Response: 40

Total Burden Hours: 600

Respondents have a full range of discretion in how they design and develop their proposal. FNS has provided guidance in the RFA on required items and on the evaluation criteria for proposals. Pre-Award hourly estimates identified above are used as the basis for determining total annual cost burden to respondents of the application.

Post Award Annual Burden

The post-award burden hours are based on the production of quarterly SF 425 Federal Financial Reporting and Quarterly Progress Reports that are submitted to FNS by the grantee(s) selected for the project. Grant activities are expected to last for up to three years. In addition to the quarterly financial and progress reports, the grantee(s) will submit a final progress report as described in the RFA, attend an online orientation for approximately 2 hours, and conduct an online closeout meeting which will last another 2 hours.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties.

For the purpose of this burden estimate, FNS assumes that the grantee(s) will spend two (2) hours in preparing reports (progress, financial, and annual reports) and .25 hours per instance in recordkeeping burden to maintain the documents necessary to support the reports. Up to five (5) grants will be awarded under this RFA. The total estimated burden is reflected in the following table:

A.12.2 Estimate of Hours Burden on Respondents for Application (Affected Public: State and Local Agencies) Post-Awardees Reporting Burden Estimates

Activity Description	Instrument	Number Respondents	Number Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Orientation Meeting (Online)	N/A	5	1	5	2	2
Progress Report (Quarterly)	N/A	5	4	20	2	40
Final Progress Report	N/A	5	1	5	2	10
Closeout Roundtable Meeting (Online)	N/A	5	1	5	2	10
Certification Regarding Drug-Free Workplace Requirements (Grants) Alternative I - For Grantees Other Than Individuals	AD-1049	5	1	5	0.17	0.85
Representations Regarding Felony Conviction and Tax Delinquent Status for Corporate Applicants	AD 3030	5	1	5	0.25	1.25
Assurance Regarding Felony Conviction or Tax Delinquent Status for Corporate Applicants	AD 3031	5	1	5	0.05	0.25
Post Award Total		5	10	50	1.287	64.35

Post Award Reporting Burden Summary

Estimated Number of Respondents: 5

Estimated Responses per respondent: 10

Estimated Total Annual Response: 50 (post)

Estimated Hours per Response: 1.287

Estimated Post Award Total Burden Hours: 64.35

A.12.3 Estimated Annualized Cost to Respondents for Pre and Post Award

Affected Public	Type of Respondent	Number of Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (hours)	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Cost
State, U.S. Territory, or District of Columbia (Pre-Award)	State agencies that administer SNAP	15	1	15	40	600	\$31.10	\$18,660.00
State, U.S. Territory, or District of Columbia (Post-Award reporting)		5	10	50	1.287	64.35	\$31.10	\$2,001.29
State, U.S. Territory, or District of Columbia (Post-Award recordkeeping)		5	9	45	0.09222	4.15	\$31.10	\$129.07
Total Cost		15	7.333	110	6.07727	668.50	\$31.10	\$20,790.36

*Cost to respondents includes responses to SF or common forms; however the post award burden estimates doesn't include burden for these forms.

Pre and Post Award Reporting Burden Summary:

These estimates in the summary below do not include the SF forms

Number of Respondents: 15

Responses per respondent: 4.333

Total Annual Response: 65

Hours per Response: 10.2207

Total Burden Hours: 600 (pre award) + 64.35 (post award) = 664.35

12.4a: Standard Forms Post Award Reporting Burden Estimates

Activity Description	Instrument	Number Respondents	Number Annual Response	Total Annual Response
Federal Financial Report (Quarterly)	SF 425	5	4	20
Federal Financial Report (Final)	SF-425	5	1	5
Application for Federal Assistance	SF-424	5	1	5
Budget Information - Non-Construction Programs	SF-424 A	5	1	5
Assurances - Non-Construction Programs	SF-424 B	5	1	5
Disclosure of Lobbying Activities	SF-LLL	5	1	5
Post Award Total		5	9	45

The estimated usage of standard forms is listed below.. The estimates for the Standard Forms (SF) are covered under the following OMB numbers for common forms: SF 425 (4040-0014), SF-424(4040-0004, SF424A (4040-0006, SF-424B (4040-0007, SF LLL (4040-0013).

12.4b: Standard Forms Post Award Recordkeeping Burden Estimates

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cxd)
State Agencies	RECORDKEEPING			
	SF-425 Final Report	5	1	5
	SF-424	5	1	5
	SF-424 A	5	1	5
	SF-424 B	5	1	5
	SF-LLL	5	1	5
	SF-425 Financial Reporting	5	4	20
Post Award Recordkeeping Total Burden Estimates		5	9	45

The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for for Social and Community Service Managers-Occupation Code 11-9151 (according to the Bureau of Labor Statistics, Occupational Employment Wages, May 2016).

Wage rates were determined using the following website:

<http://www.bls.gov/bls/wages.htm>.

The total Pre-award costs were determined by adding the total number of applicants times the total number of hours times the total hourly costs or as follows: 15 (number of applicants) x 40 hours x \$31.10 = \$18,660.00

Pre-award costs are determined to total \$18,660. Pre-award costs are one-time only costs.

Total Post-award costs for routine reporting are 5 grantees x 64.35 hours x \$31.10 = \$2,001.29. This amount is based on awarding five grants reporting and recordkeeping burden hours.

- 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 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.

14. 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.

The estimated pre-award cost to process and review applications is \$15,444.00. This is based on an estimate of 20 hours of labor to process and review *each* application package. The estimate assumes an hourly cost per staff person of \$51.48 per hour (the average salary for GS-13 grade level including overhead and benefits). This labor estimate includes 2 hours by grants management and program staff to process an application, 15 hours total by 3 Federal employees to conduct a thorough technical review of each application, and 3 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award. It is estimated that 15 applications will be received, and thus 300 hours will be needed to process and review these applications.

For the five proposals anticipated to be awarded, Federal labor costs will total \$10,296.00. This is based on approximately 25 hours spent providing technical assistance and 15 hours reviewing the 5 program reports (progress reports (4) and final report (1)) for each grantee, for a total of 40 hours. (25 hours +15 hours= 40 hours x 5 grantees x \$51.48 per hour = \$10,296.00). Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2017, for a GS 13, Step 5 employee.

Total Annualized Pre-Award Cost to	\$15,444.00
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the Government	
Total Annualized Post Award Cost to the Government	\$10,296.00
Total Annualized Cost to the Federal Government	\$25,740.00

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

This request is seeking to use (664.35) burden hours and (65) total annual responses of the generic grant information collection.

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

FNS will publicize summary information of the applicant that receives grant funding at <http://www.fns.usda.gov/>

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that this display would be inappropriate.

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

18. 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.