

SUPPORTING STATEMENT - for
OMB Control Number 0584-0336:
Disaster Supplemental Nutrition Assistance Program (D-SNAP)

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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 a revision of a currently approved collection. Pursuant to Section 5(h) of the Food and Nutrition Act of 2008, 7 U.S.C. 2014(h), the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 et seq., the Secretary of Agriculture has the authority to allow a State agency to operate a Disaster Supplemental Nutrition Assistance Program (D-SNAP), which is a temporary program to provide nutrition assistance to households affected by disasters. D-SNAP is separate and distinct from the Supplemental Nutrition Assistance Program (SNAP) because it has different standards of eligibility, is operated for a limited duration, and only provides one month's worth of benefits to eligible households.

A State agency must submit a formal request to operate D-SNAP to the Food and Nutrition Service (FNS) for approval, and may only do so in areas that have received a Presidential Disaster Declaration with authorization for Individual Assistance, also known as an IA declaration, from the Federal Emergency Management Agency (FEMA). The information collected is required for a State agency to obtain FNS approval to operate D-SNAP.

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.

In their requests, State agencies must outline their proposed procedures for operating D-SNAP and provide other supporting information, such as: an assessment of the areas where D-SNAP will be operated; the criteria that will be used to determine eligibility of applicants; how long applications will be accepted; methods to maintain program integrity; procedures for issuing Electronic Benefits Transfer (EBT) cards to eligible applicants, and other logistics regarding public information, application site locations, and staffing. FNS reviews each request and supporting information to ensure that all necessary requirements for an effective and efficient D-SNAP operation are met.

The burden associated with the certification of D-SNAP applicants by a State agency is included under currently approved OMB information collection 0584-0064 (SNAP Forms: Applications,

Periodic Reporting, Notices; expiration date: 07/31/2020). The recordkeeping burden for form FNS-292-B, Report of Disaster Supplemental Nutrition Assistance Benefit Issuance, is approved under OMB No. 0584-0037 (Report of SNAP Benefit Issuance and Commodity Distribution for Disaster Relief; expiration date: 2/28/2021), and the reporting burden is covered under OMB No. 0584-0594 (Food Programs Reporting System; expiration date: 09/20/2019); neither burden is reflected in this submission.

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 compliance with E-Government Act of 2002 (E-Gov), A State agency has the authority to use the technology that best suits its needs to comply with the information collection and reporting requirements contained in this submission.

At a minimum, a State agency must submit a D-SNAP request to FNS via email or fax. Due to the dynamic nature of emergency situations following a disaster and the need to respond quickly, FNS does not have a standardized form for D-SNAP requests.

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.

Every effort has been made to avoid duplication. Also, there is no similar information available because FNS is solely responsible for authorizing State agencies to operate D-SNAP. The information required for approval is not reported to any other entity outside of FNS.

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.

This information collection does not have a direct impact on any small entities. Only 53 State agencies involved in the administration of SNAP are potentially impacted, none of which are small businesses. While certain small businesses such as retail food stores already authorized to

participate in the SNAP indirectly benefit from the D-SNAP through increased food purchasing by program recipients, this information collection does not impose any additional information collection or reporting requirements on those businesses.

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.

D-SNAP is the primary FNS nutrition assistance response available to a State agency recovering from a disaster. If this collection is not conducted, States agencies would not be able to operate D-SNAP to help meet the temporary nutrition needs of households affected by disasters. This information is necessary to ensure that disaster procedures are promptly and effectively implemented and to preserve program integrity. This information is only collected and required to obtain benefits if a State agency wishes to operate D-SNAP in areas that have received an IA declaration from FEMA, or expand D-SNAP to additional areas that receive an IA declaration after receiving an initial D-SNAP approval from FNS. In some cases, a State agency may find that operation of a D-SNAP is not warranted even upon receipt of an IA declaration, and may utilize other FNS disaster programs to assist impacted households.

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 that cause this information collection to be conducted in a manner that is inconsistent with 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.

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.

The agency notice was published in the Federal Register on August 30, 2018, Volume 83, Number 169, Page 44258 included with this request. The 60-day comment period ended on October 29, 2018. The Department did not receive any comments.

FNS national and regional offices consult with State agencies about D-SNAP through multiple forums. Since the last renewal of this collection, FNS national and regional offices have provided annual D-SNAP training webinars for State agencies, given presentations on D-SNAP at national conferences regularly attended by State agencies, and formed a workgroup with select State agencies. Specific examples include:

- August 10, 2017 – FNS National Office hosted a D-SNAP webinar training with over 100 attendees from various State agencies.
- May 2018 – FNS SWRO convened a two-day D-SNAP workgroup with representatives from California, Florida, Louisiana, Mississippi, New York, Texas, West Virginia and FNS National Office. The workgroup met to discuss concerns, interests, and best practices concerning D-SNAP in order to provide recommendations to FNS on how to improve D-

SNAP operations at the State and Federal levels.

- August 28, 2018 – FNS National Office gave a presentation titled “D-SNAP Federal Updates and Lessons Learned from the 2017 Disaster Season” at the American Association of SNAP Directors Annual Conference¹.

FNS has not received information from affected State agencies or other stakeholders during these forums that necessitate a change to the data collection instrument or the frequency of 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.

No payments or gifts are provided to respondents under this collection.

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.

Section 11(e)(8) of the Food and Nutrition Act and section 272.1(c) of the SNAP regulations limit the use or disclosure of information obtained from applicant households or contained in the case files of participating households to persons directly connected with the administration or enforcement of the provisions of the Act or regulations, other Federal or federally assisted means-tested programs; persons directly connected with the administration or enforcement of programs required to participate in the State income and eligibility verification system; persons directly connected with the verification of immigration status of aliens; persons directly connected with the administration of the Child Support Program; employees of the Office of the Comptroller General of the U.S. for audit and examination authorized by other provisions of law; Local, State, or Federal law enforcement officials investigating an alleged violation of the Act or regulations and law enforcement officers if the household member is a fleeing felon or a parole violator. FNS published the Privacy Act: System of Records Notice (SORN) on March 31, 2000, in the Federal Register (65 FR 17251) entitled “USDA/FNS-10 Entitled Persons Doing Business with the Food and Nutrition Service” to specify the uses of the information that is collected.

¹ 2018 AASD/NASTA Conference Agenda:
https://docs.wixstatic.com/ugd/fbfc88_e7111bde4d504a8fb76cadae470eaad4.pdf

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.

No private or sensitive questions will be asked.

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

Estimated Total Annual Number of Respondents: 5, which includes an average of 5 State agencies that submit D-SNAP requests, and an average of 2 out of those 5 State agencies that may submit subsequent requests to modify or expand an approved D-SNAP. Due to agency oversight, this activity to modify or expand an approved D-SNAP wasn't accounted for in our current burden estimates and we are requesting burden for this activity to our burden inventory. FNS revised this estimate based on the annual average number of formal D-SNAP requests that were submitted and approved by FNS. It is impossible to predict the number of natural disasters that result in an IA declaration in a given year, and because some State agencies may find that operation of a D-SNAP is not warranted even upon receipt of an IA declaration we are using historical events to request for these revised estimates for the next three years. From fiscal year 2015 to 2018, an average of 5 State agencies requested and were approved to operate D-SNAP annually.

Estimated Frequency of Responses per Respondents: State agencies usually submit 1 D-SNAP request per year, and we estimate that, out of those respondents, two (2) State agencies may submit 1 subsequent modification or expansion request.

Estimated Total Annual Responses: 7.

Estimated Total Hours Per Response: Approximately 10 hours for State agency D-SNAP requests, and approximately 3 hours for each subsequent modification or expansion request.

Estimated Total Annual Burden on Respondents: 56 hours.

Respondent	Number of respondents	Responses annually per respondent	Total annual responses	Average number of hours per response	Estimated total hours
State Agency – Submission of D-SNAP Request	5	1	5	10	50
State Agency – Submission of D-SNAP modification or expansion request	2	1	2	3	6
Total Reporting Burden	5		7		56

Record Keeping Burden

The recordkeeping burden for this information collection request is covered under the currently approved OMB information collection 0584-0037 (Report of D-SNAP Benefit Issuance and Commodity Distribution for Disaster Relief; expiration date: 02/28/2021). There is no additional recordkeeping burden or third-party disclosure burden associated with this request.

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

The total annualized cost to respondents is \$949.50 (x 0.33 total cost with fully loaded wages is \$1,262.83) as depicted in the table below. The wage rates used to determine the annual cost to respondents were based on Occupational Employment Statistics estimates from the Bureau of Labor Statistics. The most recent data indicate a mean hourly wage of \$33.91 for Social and Community Service Managers² (State agency managers). However, 50 percent of the administrative costs incurred by State agencies are reimbursed by FNS. The calculations for this cost are described in the table below:

Requirement	Hourly wage rate	Annual burden hours	Cost (US\$)
Submission of D-SNAP requests by State agency managers	\$33.91	50	** Expression is faulty **

² <https://www.bls.gov/oes/current/oes119151.htm>

Submission of subsequent D-SNAP modification or expansion request by State agency managers	\$33.91	6	** Expression is faulty **
Subtotal Annual Cost			0
Minus 50% Federal reimbursement			-0
Total Annual Cost			0

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 or 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.

The total annual cost to the Federal government for this data collection is \$5,412 (x 0.33 total cost with fully loaded wages is \$7,198). This cost is based on average of hours to review a D-SNAP request and draft an approval by a Program Analyst (GS-13/1), 2 hour review by a Branch Chief (GS-14/1)³, and 1 hour review by a Division Director (GS-15/1) for each response received. The Federal cost also includes (\$949.50) the cost associated with the preparation of this information collection package and reimbursement of 50% of State Administrative costs. The calculations for this cost are described in the table below:

Review of State agency D-SNAP requests	Estimated Total Annual Burden Hours	Estimated Hourly Wage Rate	Cost (US\$) (approx.)
Program Analyst (GS-13/1)	70	\$46.46	**

Expressio

³ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx

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Branch Chief (GS-14/1)	** Expression is	\$54.91	**
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Division Director (GS-15/1)	** Expression is	\$64.59	**
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Costs to Federal workers			0
Preparation of IC request (5 hours by Program Analyst GS-13/1)			\$232
Add 50% Federal Share of State Cost (See Table A.12.B.1)			\$949.50
Total Federal cost (Federal workers cost + 50% State Cost)			\$5,412

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 a revision of a previously approved information collection. The current burden inventory is 90 burden hours and 9 total annual responses and FNS is requesting 56 burden hours and 7 total annual responses for this revision. This reflect a decrease of -34 burden hours and -2 total annual responses to this data collection request. These adjustments are a direct result in the decreased number of State D-SNAP agencies requests from fiscal year 2015 through fiscal year 2018.

FNS is also revising the total burden estimate to account for burden activities modify and expand that were inadvertently omitted from previous approvals of this collection. Once approved by

FNS to operate D-SNAP, State agencies must submit any subsequent requests to modify operations or expand D-SNAP to newly eligible areas to FNS for approval. These modification or expansion requests usually occur when a large-scale disaster impacts different areas of a State in different ways or at different times, and typically require substantially less time to prepare than initial D-SNAP requests.

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.