

Supporting Statement for OMB Clearance

**Supplemental Nutrition Assistance Program
State Agency Performance Reporting**

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A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Federal law mandates state agencies administering Supplemental Nutrition Assistance Programs (SNAP) to participate in a computer matching program with the federal Office of Child Support Enforcement (OCSE). The computerized matching program compares each state SNAP agency's applicant and recipient information with employment information maintained in the National Directory of New Hires (NDNH). The outcomes of the computerized match provide each state SNAP agency with information that will help to establish or verify an individual's eligibility for SNAP benefits. Determining eligibility also helps each state agency to reduce payment errors, identify duplicate participation, and maintain program integrity. To receive NDNH information, each state SNAP agency must enter into a computer matching agreement with OCSE and adhere to its terms and conditions, including providing OCSE with annual performance outcomes reports.

The legal authority for the information collection activities associated with the SNAP performance reports is: 1) subsection 453 (j)(10) of the Social Security Act (42 U.S.C. §653(j)(10)), which allows the Secretary of the U.S. Department of Health and Human Services to disclose information maintained in the NDNH to state agencies administering SNAP under the Nutrition Act of 2008, as amended by the Agriculture Act of 2014; and, 2) the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988 (5 U.S.C. § 552a), which sets forth the terms and conditions of a computer matching program; and 3) the Government Performance and Results Modernization Act of 2010, (Pub. L. 111-352, §4, 124 Stat. 3865, 3871-73 (2011)), which requires agencies to report program performance outcomes to the Office of Management and Budget (OMB) and for the reports to be available to the public.

2. Purpose and Use of the Information Collection

The information collected is used to measure cost savings that state SNAP agencies realize resulting from the SNAP-NDNH computer matching program.

OMB requires OCSE to periodically report performance measurements demonstrating how the use of NDNH information supports OCSE's strategic mission, goals, and objectives. OCSE will fulfill this performance measurement reporting requirement by compiling the state agency outcomes into OCSE's periodic performance measurement reports to OMB.

3. Use of Improved Information Technology and Burden Reduction

The performance outcomes reporting tool for this information collection is a commonly used electronic, formatted spreadsheet to perform automated data calculations of inputted values. OCSE provides a performance reporting tool for the state SNAP agencies to populate electronically, and then return to OCSE electronically. Using available technology

and electronic processes eliminates manual calculation and computation errors, as well as costs to submit the reports by mail.

4. Efforts to Identify Duplication and Use of Similar Information

State SNAP agencies' performance outcomes that are attributable from computerized comparisons with the NDNH are unique and not available from other sources.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

OCSE requires state SNAP agencies to provide their performance outcomes reports annually. Collecting the information less frequently would result in OCSE providing outdated cost-savings measurements and inaccurate periodic performance reports to OMB. Not collecting the information at all would also jeopardize OCSE's ability to comply with the federal requirement to provide OMB with the periodic performance reports.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Not applicable.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A notice of the information collection published in the Federal Register at 83 FR 3731 on January 26, 2018, which allowed a 60-day comment period for the public to submit in writing comments about this information collection.

OCSE received letters from Louisiana and Texas SNAP agencies, and the American Public Human Services Association, each of which raised concerns about the usefulness and cost effectiveness of using NDNH information to determine eligibility for the SNAP program or to maintain the program's integrity. State SNAP agency employees are required to determine eligibility as part of their usual and customary responsibilities, which includes verifying any wage and employment information derived from the SNAP-NDNH computer match. Matching to the NDNH may reveal previously unknown wages and employment of a SNAP applicant or recipient, which may also result in the state agency recalculating or adjusting a SNAP benefit amount for an individual with a match in the NDNH.

The burden hour in the SNAP Performance Outcomes 60-day notice pertains to populating the Performance Outcome Report. States input cost savings to the state SNAP agency that result from any recalculations or adjustments in benefits that are identified through the

eligibility determination process after verifying the NDNH information. Therefore, the burden to populate the Performance Outcome Report does not pertain to the verification and eligibility determination requirement of the computer matching program itself.

OCSE provided the letters to the Food and Nutrition Service of the U.S. Department of Agriculture, the federal agency that oversees SNAP, to respond as necessary.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Confidentiality for the respondent is not necessary because the information collected does not contain personally identifiable information. Respondents will provide financial information demonstrating cost avoidance resulting from the SNAP-NDNH computer matching program.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

The burden hours are estimates derived from a few SNAP agencies that participate in the SNAP-NDNH computer matching program and informed OCSE of the average time it took staff to populate the performance reporting tool.

Table 12.1 Respondents' Hour Burden

Information Collection Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
SNAP Agency Matching Program Performance Reporting Tool and Instructions	53	1	1.92	101.76

The annualized cost to respondents for the burden hour is \$20.79, which is the national average wage rate per hour for state employees.¹ The average annualized cost per

¹ Based on Bureau of Labor Statistics National Compensation Survey May 2016

respondent is approximately \$40² (\$20.79 x 1.92), and the total average annualized cost to all respondents is approximately \$2,120.

Table 12.2 Respondents’ Cost for Hour Burden

Reporting Requirement	Average Annualized Cost per Respondent ³	Total Annualized Cost
53 State SNAP Agencies	\$40	\$2,120

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no capital, start-up costs, and no ongoing costs to the respondent to populate the performance reporting tool because it is a pre-formatted and universally used desktop application that states submit electronically to OCSE.

14. Annualized Cost to the Federal Government

The cost to the federal government to administer the SNAP-NDNH computer matching program is included in the overall cost to the federal government to operate and maintain the NDNH (OMB #0970-0166), which is estimated to be \$13.4 million. This cost includes the system development and technical assistance contracting costs, telecommunications, security, data quality, and software and hardware costs incurred by OCSE in association with the NDNH.

There are no other costs to the federal government for this information collection because the reporting tool is a universally used desktop application that states receive electronically.

15. Explanation for Program Changes or Adjustments

The performance reporting tool instructions underwent minor grammatical edits; however, these program changes do not impact the burden hour or costs.

Additional state SNAP agencies provided OCSE with their hourly estimates to populate the SNAP Performance Reporting tool since the previous approval and the total number of state SNAP agencies that are required to participate in the matching program and, therefore, to provide performance outcomes reports increased from 52 to 53. The adjustments to the hourly estimates and the number of respondents resulted in an increase to the total burden hour, which is reflected in Table 12.1.

² Total rounded up from \$39.92

³ Total rounded up from \$39.92

The annualized cost to respondents increased from the previous approval. This adjustment is a result of an increase in the average hourly wage of state agency program staff, per the Bureau of Labor and Statistics National Compensation Survey, since the previous approval.

16. Plans for Tabulation and Publication and Project Time Schedule

OCSE provides OMB with an annual performance report, which includes the compiled information collected from each state SNAP agency performance report.

17. Reason(s) Display of OMB Expiration Date Is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

B. STATISTICAL METHODS

The information collection requirements outlined in this supporting statement do not employ the use of statistical methods.