

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0605:

**Annual State Report on Verification of Supplemental Nutrition Assistance Program
Participation**

Program Analyst

Supplemental Nutrition Assistance Program

USDA, Food and Nutrition Service

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ATTACHMENT 11 A SAMPLE EMAIL FROM FNS REGIONAL OFFICES TO STATE SNAP AGENCIES

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 currently approved information collection to meet Supplemental Nutrition Assistance Program (SNAP) reporting requirements specified in Section 4032 of the Agricultural Act of 2014. Section 4032 mandates that States will “submit to the Secretary a report containing sufficient information for the Secretary to determine whether the State agency has, for the most recently concluded fiscal year preceding that annual date, verified that the State agency in that fiscal year- (1) did not issue benefits to a deceased individual; and (2) did not issue benefits to an individual who had been permanently disqualified from receiving benefits.”

This collection implements Section 4032 by requiring State agencies to verify that systems are in place to comply with associated regulations governing SNAP. SNAP regulations at 7 CFR 273.16 require that State agencies disqualify an individual who has committed an intentional program violation (IPV). Paragraph 7 CFR 273.16(e)(8) requires that these individuals “be disqualified in accordance with the disqualification periods and procedures in paragraph (b) of this section” (273.16(b)). Paragraph 7 CFR 273.16(i) requires State agencies to report information concerning each individual disqualified for an IPV to the disqualified recipient database, the electronic Disqualified Recipient System (eDRS), and to use eDRS data to determine the eligibility of individual applicants prior to certification. SNAP regulations at 7 CFR 272.14 require that each State agency establish a system to verify and ensure that benefits are not issued to individuals who are deceased, and that data source is the Social Security Administration’s (SSA) Death Master File.

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.

The information required for the Annual State Report on Verification of SNAP Participation is obtained by validating that the State agency had the appropriate systems in place and followed procedures currently mandated at 7 CFR 272.14 and 7 CFR 273.16 for the preceding fiscal year. State agencies must annually confirm, by stating in one email to their FNS Regional SNAP Program Director, that the appropriate systems were in place in the State to meet the requirements of regulations at 7 CFR 272.14 and 273.16(i)(4), and that they conducted the matches required by these regulations. States are required to submit their Section 4032 reports to the FNS Regional SNAP Director by March 31 each year for the preceding Federal fiscal year. 7 CFR 272.1(f) mandates that State agencies are required to retain all records associated with the administration of SNAP for no less than 3 years.

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.

FNS makes every effort to comply with E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. The collection most commonly occurs via electronic mail (email).

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. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNS monitors State performance to ensure program integrity and that the program is efficiently and economically operated.

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.

Information being requested or required has been held to the minimum required for the intended use. Although two 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 agencies. Thus, they maintain the same kinds of information on file.

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.

This is an ongoing, mandatory data collection. The Agricultural Act of 2014 and FNS Codes of Federal Regulations (CFR) mandates this annual verification be reported to FNS. Requiring this verification less frequently, therefore, would be non-compliant with Federal statute. FNS would not be able to adequately monitor State performance to ensure program integrity and that the program is efficiently and economically operated.

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.

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 published a 60-day notice for comments in the Federal Register on February 11, 2019 in Volume 84 on Page 3,138. FNS received 9 comments (Attachments 2-10) submitted by the completion of the 60-day comment period. However, none of those comments were related to the Annual State Report on Verification of Supplemental Nutrition Assistance Program Participation. Also, FNS incorrectly published the 60dayFRN as an extension without change, however, during the development of the this renewal, FNS discovered the prior collection didn't include the burden time for 53 Administrative Service Managers and have made the adjustments within this revised request.

FNS Regional offices are in continual contact with State agencies, which provides an ongoing opportunity for State agency feedback on FNS processes and procedures that may impact them. FNS Regional offices hold conferences and meetings with State agency leaders and staff to inform them of pertinent policy and to receive valuable input. FNS has not received any State agency comments/concerns about the burden of his 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.

FNS has no plans to provide 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.

Agency complies with the Privacy Act of 1974. FNS published a system of record notice in the Federal Register at FR Vol. 75, No. 247 Page 81205 on December 27, 2010.

USDA/FNS-5, Information on Persons Disqualified from the Supplemental Nutrition Assistance Program.

<https://www.federalregister.gov/documents/2010/12/27/2010-32457/privacy-act-revision-of-privacy-act-systems-of-records#p-30> Pursuant to the Privacy

Act, 5 U.S.C. 552a, FNS issued USDA/FNS-5, *Information on Persons Disqualified from the Supplemental Nutrition Assistance Program*,

Supplemental Nutrition Assistance Program Retailer Information. USDA/FNS-5 contains personal information about persons disqualified from participating in SNAP. The system is owned, administered, and secured by the Food and Nutrition Service (FNS). The primary purpose of this system is to assist in the administration and enforcement of the Supplemental Nutrition Assistance Program (SNAP), as well as other Federal and State laws.

The system of records notices explain how the records within the system will be used and with whom they will be shared.

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.

There are no sensitive questions included in this submission.

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.

All 53 States are required to compile and report this information once annually; however, there are two State agencies staffers (1) Eligibility Interviewer and (2) Administrative Service Managers) participating in this data collection for each State.

Fifty-three (53) State agencies Administrative Service Managers will receive and read the annual reminder email from FNS Regional Offices (Attachment 11 A) one time annually for a total of **53 total annual responses**. It will take them approximately 0.167 (10 minutes) each to read the email for an estimated total annual burden estimate of **8.85 hours**.

The same 53 State agency Administrative Service Managers will respond to the reporting burden requirement one time annually via email for an additional response of **53 total annual responses** for this activity. The 53 State agency Administrative Service Managers **1 hour** burden time each to consult with the appropriate agency departments to confirm that the proper systems are in place throughout the agency (0.75 hours per respondent), and to draft and send one confirmation email to the FNS Regional SNAP Director (0.25 hours per respondent) that both required matches have been completed; for an estimated total of **53 hours**. The overall burden for the

Administrative Service Managers in this collection is **106 total annual responses and 62.85 burden hours.**

There are 53 State agency Eligibility Interviewer who will respond one time annual to this information collection for an estimated total of **53 total annual reporting responses.** The estimated reporting burden per 53 State agency Eligibility Interviewer is **1 hour** for each staffer for reporting for an overall annual reporting burden of **53 burden hours** for Eligibility Interviewers for this activity.

The same staffer is required to maintain each record for an estimated total **53 total annual recordkeeping responses** and FNS estimates there will be 53 State agency Eligibility Interviewers required to maintain these records for three (3) years. The estimated recordkeeping burden per agency is **0.083 hours (5 minutes).** This estimate accounts for the time it will take State agencies to comply with the 3-year record retention requirement. The total recordkeeping burden is **4.40 hours.**

The total combined burden for the State agency Administrative Manager and Eligibility Interviewer is reporting (**114.85 hours**) and recordkeeping (**4.4 hours**) is **119.25 burden hours** annually.

Table A12.A Reporting Burden for State Agencies

CFR	Action	Respondent Type	Number of Respondents	Estimated Number of Responses per Respondent	Total Annual Responses	Burden Hours Per Response	Total Burden Hours	Hourly Wage Rate	Estimated Annual Cost to Respondent
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7 CFR 272.14 and 7 CFR 273.16	Annual Email Reminder	*Administrative Manager	53	1	53	0.167	8.85	\$50.00	\$442.55
7 CFR 272.14 and 7 CFR 273.16	Compile, Report & Submit to FNS via email	Administrative Manager	53	1	53	1	53	\$50.99	\$2,702.47
7 CFR 272.14 and 7 CFR 273.16	Information Collection	*Eligibility Interviewer	53	1	53	1	53	\$22.34	\$1,184.02
Sub-Total Reporting			106	1	159	1	114.85	-	\$3,894.84
7 CFR 272.1(f)	Recordkeeping	Eligibility Interviewer	53	1	53	0.083	4.4	\$22.34	\$98.30
Grand Total			106	1	212	0.5625	119.25		\$3,993.14

*Note: 53 State agency Administrative Managers and 53 State agency Eligibility Interviewer are counted 1 time each for a total of 106 Staff members participating in this data collection.

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 cost to respondent annually is **\$2,655.47**. The estimate total annual cost to respondent is determined by using the base cost + fringe benefits divided by 50 %. The cost to respondents with fully-loaded wages is **\$5,310.93** (\$3,993.14 annual base cost + \$1,317.79 fringe benefits) we used 0.33 percent to account for fully-loaded wages). Additionally, the Federal Government will reimburse States 50% of administrative costs associated with this data collection. The Federal share of this cost is 50%; therefore, 50% of this cost is reimbursed to the respondent.

Based on the Bureau of Labor Statistics May 2018 Occupational and Wage Statistics – 43-4061 (<http://www.bls.gov/oes/current/oes434061.htm>), hourly mean wage for Eligibility Interviewers, Government Programs functions performed by State and local agency staff are valued at \$22.34 per hour. The information requested in this collection will, therefore, be collected and recorded by State staff at \$22.34 per hour, for 53 hours for reporting burden for collection + 4.40 hours for

recordkeeping). This totals to **\$1,282.32** (\$1,184.02 reporting cost annually + \$98.30 recordkeeping cost annually).

Based on the Bureau of Labor Statistics May 2018 Occupational and Wage Statistics – 43-4061 (<http://www.bls.gov/oes/current/oes113011.htm>), hourly mean wage for Administrative Services Managers functions are valued at \$50.99 per hour. The information requested will be reported via email by State agency managers at \$50.99 per hour, for 53.167 reporting burden hours annually. This totals to **\$2,710.99** annually.

Table A12.B Reporting Cost for State Agencies

State Staff	Action	Total Annual Responses	Estimated Annual Total Burden Hours	Estimated Staff Cost per Hour	Total Cost to Respondent
Eligibility Interviewer	Information Collection	53	53	\$22.34	\$1,184.02
Eligibility Interviewer	Recordkeeping	53	4.40	\$22.34	\$98.30
Administrative Service Manager	Reporting	106	53.167	\$50.99	\$2,710.99
Subtotal	All	212	110.167	-	\$3,993.31
w/Fringe Benefits which is 33% of base rate					\$1,317.79
Base Rate plus Fringe Benefits					\$5,299.97
Less %50 Federal Reimbursement					\$2,649.88

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 and/or annualized maintenance costs associated with this burden.

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 combined estimated total annualized cost to the Federal government is **\$6,975.11 with fully loaded wages included**. This cost includes (\$744.36 reimbursable rate paid to States agencies + \$1,979.01 for FNS Regional SNAP Directors + \$746.80 for FNS Branch Chief + \$4,251.74 for FNS Program Analyst). The breakdown of the cost are identified below.

The Federal government reimburse State agencies 50% of their administrative costs. As indicated in question 12, the cost to respondents (States) is \$1,488.72. FNS divide this cost respondents by 50% which is **\$744.36** this amount is included in the cost to the Federal government.

The information collection estimates a total of 26.5 hours each x 53 = 1,404.50 burden hours of Federal employee time for FNS Regional SNAP Directors to review and file per year: for a GS-14, Step 1 in the Washington-DC locality, at \$56.15 per hour for a total of \$1,487.98 (plus \$491.03 which is 33 % of this cost = **\$1,979.01** for fully loaded wages).

Additionally, this information collection estimates a total of 10 hours staff time for FNS Headquarters' Branch Chief time to review and edit this collection per year: for a GS-14, Step 1 in the Washington-DC locality, at \$56.15 per hour for a total of \$561.50 (plus \$85.301 which is 33% of this cost = **\$746.80** (for fully loaded wages).

Lastly, this information collection estimates a total of 80 hours staff time for FNS Headquarters' Program Analyst time to draft, edit and manage this collection per year: for a GS-12, Step 1 in the Washington-DC locality, at \$39.96 per hour for a total of \$3,196.80 (plus \$1,054.94 which is 33% of this cost = **\$4,251.74** (for fully loaded wages).

All Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) effective January 2019.

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 currently approved information collection. The current burden inventory is 53 State agency staffers (Eligibility Interviewers) 57.4 burden hours and 53 total annual responses. This request is for **106 State agency staffers** (53 Eligibility Interviewers and 53 Administrative Managers), **119.25 burden hours** and **212 total annual responses** for reporting and recordkeeping. This is an increase of 53 State agency staffers, 53.167 additional burden hours and 106 additional responses. These adjustment are due to Administrative Managers responsibility for these activities was not included in the last request. There are no program changes with this request.

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.

FNS does not intend to publish the information included in this collection.

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.

FNS is not seeking approval to omit the expiration date of OMB.

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.