

Supporting Statement for
Paperwork Reduction Act
Submission for Performance Reporting
System – Management Evaluation
OMB Number 0584-0010

Prepared by:

Simon Miller

U.S. Department of Agriculture
Food and Nutrition Service
3101 Park Center Drive Room 08.0051
Alexandria, VA 22302
703-605-3205
simon.miller@usda.gov

Table of Contents

Justification

1. Explanation of Circumstances That Make Collection of Data Necessary.....	3
2. Purpose and Use of the Information.....	3
3. Use of Information Technology to Burden Reduction.....	4
4. Efforts to Identify Duplication and Use of Similar Information.....	4
5. Impacts Small Businesses or Other Small Entities.....	4
6. Consequences of Collecting the Information Less Frequently.....	4
7. Special Circumstance Relating to the Guideline of 5 CFR 1320.....	5
8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.....	5
9. Explanation of Any Payment or Gift to Respondents.....	5
10. Assurance of Confidentiality Provided to Respondents.....	5
11. Justification for Sensitive Questions.....	7
12. Estimates of Hour Burden Including Annualized Hourly Costs.....	7
13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers.....	8
14. Annualized Cost to Federal Government.....	8
15. Explanation for Program Changes or Adjustments.....	8
16. Plans for Tabulation and Publication and Project Time Schedule.....	8
17. Reason(s) Display of OMB Expiration Date is Inappropriate.....	8
18. Exceptions to Certification for Paperwork Reduction Act Submission.....	9

List of Appendices

- A. Section 11 of the Food and Nutrition Act of 2008
- B. 7 CFR 272.1 – General Terms and Conditions
- C. 7 CFR 275.5 – 275.9 – Management Evaluation Review Schedule
- D. 7 CFR 275.16 – 275.17, 275.19 – Corrective Action
- E. FNS Public Comment Received Anonymous Anonymous
- F. FNS Public Comment Received E Margareta Griffith

A. Justification

- 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.**

This is a revision of a currently approved information collection associated with Supplemental Nutrition Assistance Program (SNAP) Performance Reporting System (PRS). Section 11 of the Food and Nutrition Act (the Act) of 2008, as amended, requires that State agencies maintain records necessary to ascertain that SNAP is operating in compliance with the Act and regulations and must make these records available to the Food and Nutrition Service (FNS) for inspection.

- 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.**

Initially established in 1980, the purpose of the PRS is to ensure that each State agency and project area is operating SNAP in accordance with the Act, the regulations, and the State agency's Plan of Operation. The System enables each State agency to monitor its administration of SNAP. It is also a tool used by FNS to evaluate State agency operations and to collect information that is necessary to develop solutions to improve the State's administration of SNAP policy and procedures. The State agencies submit their ME reviews to FNS via hard copy or email. While there are Standard Operating Procedures and guidance materials available to State agencies, there is no official format for the submissions. These are the requirements below:

Per 7 Code of Federal Regulations (CFR) Part 275, each State agency is required, to submit one Management Evaluation (ME) review schedule every one, two, or three years, depending on the project area make-up of the State, unless the State receives approval for an alternative ME review schedule.

Under 7 CFR Part 275, each State must establish a system for analysis and evaluation of all data available to the State. Data analysis and evaluation is an ongoing process that facilitates the development of effective and prompt corrective action.

Under 7 CFR Part 275, State agencies must prepare a corrective action plan (CAP) addressing identified deficiencies. The State agencies must develop a system for monitoring and evaluating corrective action and submit CAP updates, as necessary.

- 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.**

FNS is committed to complying with the E-Government Act, 2002 to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. For the PRS, State agencies have the authority to use information technology that best suits the needs of their individual or unique systems of operations to comply with this information

collection. There is no system available to allow respondents (State agencies) to submit this information to FNS 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.

FNS is solely responsible for monitoring State agencies SNAP Performance Reporting Systems to ensure integrity. There are currently no known private or State agencies monitoring systems in place which are designed to obtain data similar to that required for the PRS.

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.

This information collection does not affect small business or other small entities. The collection is limited to what is necessary to comply with statutory requirements and to protect SNAP integrity.

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 mandatory and ongoing data collection. If FNS did not collect this information we would not be able to support the Federal ME review of State agency and project area administration of certification determination and benefit issuance to eligible SNAP households. The ME review process assures administrative continuity and supports

continued program integrity. Regularly scheduled State agency and Federal ME reviews provide FNS with increased opportunity to identify discrepancies and enable problem resolution thereby increasing SNAP accountability.

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 that require information collection inconsistent with 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.

The 60-day notice (84 FR 5049) for this submission was published on June 26, 2019 on page 30083. FNS received and posted two comments (Appendices E-F) on this submission and neither were germane to the clarity, time, cost or practical utility for this information collection.

The National Office also consulted with State agency representatives from Georgia, Mississippi, and Massachusetts on the issue of burden estimates for ME reviews. FNS did not receive sufficient information from the affected State agencies during these consultations to necessitate a change to the burden estimates in this information collection. The contact information for the State agencies is provided below:

Name: Kimberlin Donald / Sean Boyd
State: Georgia
Title: SNAP Director / ME Director
Phone: 404-615-2473

Name: Kina Swift
State: Mississippi
Title: ME Coordinator
Phone: 601-359-4859

Name: Cynthia Zabin
State: Massachusetts
Title: Assistant Director for SNAP Compliance
Phone: 617-348-8464

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

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

10. 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 Act and implementing regulations at 7 CFR 272.1 limit the use or disclosure of information obtained from applicant households to persons directly connected with either the administration or safeguarding the integrity of SNAP. The activities covered by this action are to be used only by those directly connected with the administration of SNAP.

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.

This information collection does not ask any questions of a sensitive nature.

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.

The affected public for this data collection is 53 SNAP State Agencies. FNS estimates that the total hour burden of the collection of information for the State agencies to be 491,172 burden hours annually (490,992 for reporting and 180 for recordkeeping) and 3,074 total annual responses (1,537 reporting total annual responses and 1,537 total annual responses for recordkeeping). This estimated burden is based on the assumption that 53 State agencies will submit 1 review schedule for a total of 53 annual responses and take an average of 4 hours to prepare each review schedule, for a total of 212 annual burden hours to prepare review plans. These same 53 States will take 80 hours each to review plan development for a total of 4,240 annual burden hours for this activity. Additionally, each State agency (53) will conduct approximately 27 reviews each annually for a total number of annual reviews conducted estimated at 1,431 reviews, and it will take approximately 340 hours for each State to conduct their reviews, for an estimated total annual burden of 486,540 hours to conduct the ME reviews and 180 in recordkeeping hours.

12a. 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.

ME Review Schedules

Review schedules are required to be submitted to the appropriate FNS Regional Office no later than 60 days prior to the start of each Federal fiscal year. FNS estimates that it takes 4 hours to prepare a review schedule, and that each of the 53 State agencies would submit one review schedule per year, resulting in a total burden of 212 hours (53 State agencies x 1 schedule x 4 hours).

ME Review Plan

Each State agency is required to submit a review plan annually. The number of hours required to prepare these plans is a function of the number and size of project areas in the State. Not all project areas are reviewed annually. FNS estimates that the 53 State agencies annually prepare plan reviews for approximately half of the total number of State project areas. Further, FNS estimates that it takes on average approximately 80 hours to develop a comprehensive State review plan, resulting in a total of 4,240 hours (80 hours x 53 State plans).

ME Reviews

FNS estimates that it takes an average of 340 hours to conduct a review. It is estimated that ME reviews are conducted for one-half of the total number of project areas (1,431) annually. Therefore, FNS estimates that it will take approximately 486,540 hours annually to conduct ME reviews.

Reporting Burden Estimates:

Regulatory Citation	Respondent	Estimated # of Respondents	Responses Annually per Respondent/Reviews	Total Annual Responses	Estimated Avg. # of Hours per Response	Estimated Total Hours (Col. dxe)
---------------------	------------	----------------------------	---	------------------------	--	----------------------------------

Reporting Burden						
7 CFR 275.20	State and Local agencies review schedule	53	1	53	4	212
7 CFR 275.16-18	State and Local correction action development	53	1	53	80	4,240
7 CFR 275.19	State and Local agencies conducting reviews	53	27	1,431	340	486,540
	Total Reporting Burden	53	29	1,537		490,992

Recordkeeping Burden Estimates:

Recordkeeping

In accordance with FNS requirements, each State agency must keep records of ME reviews and submit such reports and other information as required by FNS. The State agency must retain all ME records in an orderly fashion for audit and review purposes for no less than 3 years from the month of origin of each record. Additionally, the State agency must retain fiscal records and accountable documents for 3 years from the date of fiscal or administrative closure.

FNS estimates that the time necessary for recordkeeping, that is, the time necessary for State agencies to document and maintain the findings of an ME review to remain in compliance with FNS recordkeeping requirements. Recordkeeping requires one record keeper per State agency and each record keeper manages approximately 29 records, totaling 1537 records annually. Each record requires 0.1169 hours, or 7 minutes, to complete. A total of 180 hours are needed for recordkeeping.

Regulatory Citation	Record Keeper	Estimated # of Record Keepers	Records Annually per Record Keeper	Total Annual Record (Col. bxc)	Estimated Avg. # of Hours per Record	Estimated Total Hours (Col. dxe)
7 CFR 275.4	State and local agencies	53	29	1537	.1169	179.68
Total Recordkeeping Burden		53		1537		180

12b. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories

The overall total annual cost to the respondent with fully loaded wages is \$14,822,441.29 which includes the (\$11,144,692.70 annual cost to respondents + \$3,677,748.59 fringe benefits).

The cost to State agencies is based on \$45.38 per hour for management analyst staff in accordance with the National Compensation Survey: Occupational Wages in the United States, May 2018.¹ This rate after 50 percent reimbursement by FNS is \$22.69.

Therefore, the total cost to respondents is \$11,144,692.70 (491,172 burden hours x \$22.69).

Affected Public	Burden Hours	Hourly Wage Rate	Cost
Reporting	490,992	\$22.69	\$11,140,608.50
Recordkeeping	180	\$22.69	\$4,084.20
TOTAL	491,172	\$22.69	\$11,144,692.70

Note* Total Cost to Respondent rate for Reporting and Recordkeeping is after 50 per cent reimbursement by FNS.

13. 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

¹ <https://www.bls.gov/oes/current/oes131111.htm>

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.

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 overall total annual cost to the Federal government with fully loaded wages is \$14,823,331.10 which includes the (\$11,145,361.70 annual cost to respondents + \$3,343,608.51 fringe benefits). All costs incurred by State agencies in the administration of the ME process are reimbursed at 50 percent. The estimated annual cost to the Federal government for State agency incurred ME expense is over \$10 million. The estimated reporting expense is calculated by multiplying the total number of burden hours, 490,992 times half the cost of (\$45.38 per hour for State agencies hourly wage) which is, \$22.69, per hour. The estimated recordkeeping expense is calculated by multiplying the total number of burden hours, 180 times half the cost of the hourly wage, \$22.69, per hour. In addition, it took a Program Analyst GS-11 using the 2019 Federal Salary Table 20 hours to prepare this data collection, at (\$33.45) hourly wage rate this cost is \$669 for a total cost of \$11,145,361.70.

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

This is a revision of a currently approved collection. The current burden inventory is 491,172 burden hours and 3,072 total annual responses. The burden hours remains unchanged, however there is a slight increase in the revised total annual responses 3,074 due to adjustments made during rounding.

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

There are no plans for statistical analyses in publications.

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

This submission is not seeking OMB approval to not display the expiration date.

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.