

**SUPPORTING STATEMENT for  
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND  
TRAINING PROGRAM PERFORMANCE MEASUREMENT, MONITORING AND  
REPORTING REQUIREMENTS**

**OMB No. 0584-0614**

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Appendix A: Legal Authority

Appendix B: Burden Table

**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 an extension, without change, of a currently approved collection. In accordance with Section 16(h)(5) of the Food and Nutrition Act (FNA), as amended by section 4022 of the Agriculture Act of 2014, and 7 CFR 273.7(c)(17) the Department requires that State agencies report outcome data for the Supplemental Nutrition Employment Program (SNAP) Employment and Training (E&T) programs. In order for FNS to monitor the effectiveness of E&T programs State agencies are required to report outcome data on five separate reporting measures: (1) the number and percentage of E&T participants who retain employment 2 quarters and 4 quarters after completing E&T; (2) the median wages for participants with earnings 2 quarters after completion of E&T; (3) the number and percentage of participants that completed a training, education, work experience or on-the-job training component; (4) certain unique characteristics of SNAP E&T participants; and (5) additional reporting requirements for State agencies that pledge to serve all at-risk Able-bodied Adults without Dependents (ABAWDs). State agencies are also required to identify appropriate reporting measures for each proposed component that serves a threshold number of participants of at least 100 a year. State agencies identify the reporting measures for these components in State agencies' E&T plans and report the outcome data to the Food and Nutrition Service (FNS) through State agencies' annual reports. State agencies are required to report outcome data annually.

## **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.**

With this information, FNS is able to identify more, and less, successful E&T practices and provide technical assistance to State agencies to improve their E&T programs. This process is critical to building a more effective E&T operation nationally that will help move more individuals into the workforce more quickly. As required by 7 CFR 273.7(c)(17) State agencies administering the SNAP E&T program in 50 States, the District of Columbia, Guam and the U.S. Virgin Islands, must submit an annual E&T report by January 1<sup>st</sup> each year for the preceding federal fiscal year. Information to be reported includes the number and percentage of E&T participants who retain employment in the 2<sup>nd</sup> and 4<sup>th</sup> quarters after completion of E&T; the quarterly median wages of participants in the 2<sup>nd</sup> quarter after E&T completion; the number and percent of participants that complete an educational or training activity; and certain unique characteristics of E&T participants. Additionally, State agencies are required to identify outcome reporting measures for State components in their E&T State Plan and report on those outcome measures that are intended to serve at least 100 participants a year in the annual report. In addition, State agencies who have received additional funds for committing to offering at-risk Able Bodied Adults without Dependents (ABAWDs) a position in an E&T program are required to report through the annual report on the monthly average number of individuals the State offered a position in an E&T program; the monthly average number of individuals who participated in an E&T program; and the description of the types of E&T programs the State agency offered to at-risk ABAWDs.

### **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.**

SNAP is administered and operated by State and local government agencies and as such, it is their decision on how data is collected. State agencies submit numerous reports to FNS regarding SNAP, the vast majority are generated by automated systems. The Department supports States automation and modernization efforts and their development is funded with matching funds. For this requirement, States are expected to automate the data collection process as much as possible and the Department will facilitate electronic submission of the information collection. The Department is also committed to complying with the E-Government Act, 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.

### **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.**

There is no similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA recordkeeping requirements, state administrative agency recordkeeping requirements, and special studies by other government and private agencies. FNS solely monitors and administers SNAP.

### **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. No small entities are impacted by this collection of information.

**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 information collection request. Without this data collection, FNS will continue to be severely limited in understanding effective E&T practices and providing assistance to States in improving their operations. FNS considered more frequent (quarterly) collection of the reporting measures, but determined that the data would be incomplete and its usefulness uncertain. Beyond the FNA requirement that measures be reported annually, less frequent reporting would result in FNS frequently relying on outdated information.

**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.**

On May 7, 2019, FNS published the notice in the *Federal Register* (FR) Volume 84, Page 19901.

FNS received two (2) public comments however the comments were beyond the scope of the information collection. The following individuals/organizations have been consulted about

burden estimates associated with this data collection: 1)Ed Bolen, Center for Public Policy

Priorities, [ed.bolen@cbpp.org](mailto:ed.bolen@cbpp.org); 2) Kermit Kaleba, National Skills Coalition,

[kermitek@nationalskillscoalition.org](mailto:kermitek@nationalskillscoalition.org); and 3)David Kaz, Seattle Jobs Initiative,

[dkaz@seattlejobsinit.com](mailto:dkaz@seattlejobsinit.com)

**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.**

FNS does not offer any assurance of confidentiality to the respondents.

**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 involved in this information collection.

**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.**

State agencies will continue to use a combination of methods to collect the outcome data, including existing automated data systems, sampling methods, and some direct contact with SNAP E&T participants. FNS estimates that the ongoing burden will average no more than 231



hours annually per State on average, or 12,233 hours per year for all States). The breakdown of the 231 hours is itemized in the table below. FNS believes this estimate may be somewhat high since data that can be collected through automated data systems is expected to require less time than data collected through direct contact with SNAP E&T participants.

<b>Estimated Ongoing Reporting and Recordkeeping Burden Hours</b>						
<b>Regulation Section</b>	<b>Description of Activity</b>	<b>Number of Respondents</b>	<b>Annual Report/ Record Filed</b>	<b>Total Annual Responses</b>	<b>Average Burden Hours Per Response</b>	<b>Total Burden Hours</b>
<b>272.1(f) Recordkeeping</b>		53	1	53	1	53
<b>273.7(c)(17)(i) Reporting</b>	E&T participants who have earnings in the second quarter after completion of E&T	53	1	53	40	2120
<b>273.7(c)(17)(ii) Reporting</b>	E&T participants who have earnings in the fourth quarter after completion of E&T	53	1	53	40	2120
<b>273.7(c)(17)(iii) Reporting</b>	Median quarterly earnings	53	1	53	40	2120
<b>273.7(c)(17)(iv) Reporting</b>	E&T participants that completed a training, educational, work experience or an on-the-job training component within 6 months after completion of participation in E&T	45	1	45	80	3600
<b>273.7(c)(17)(v) &amp; (vi) Reporting</b>	Characteristics of E&T participants, some broken out by 4 above measures	53	1	53	20	1060
<b>273.7(c)(17)(vii)</b>	Measures in a State	53	1	53	20	1060

<b>Reporting</b>	agencies' E&T plan for components that are designed to serve at least 100 E&T participants a year					
<b>273.7(c)(17) (viii) Reporting</b>	Information about ABAWDs from State agencies that have committed to offering them participation in a qualifying activity	10	1	10	10	100
<b>Total Reporting</b>		<b>53</b>	<b>7</b>	<b>320</b>	<b>38</b>	<b>12,180</b>
<b>Total Recordkeeping</b>		<b>53</b>	<b>1</b>	<b>53</b>	<b>1</b>	<b>53</b>
<b>Total</b>		<b>53</b>	<b>7.03774</b>	<b>373</b>	<b>32.7962</b>	<b>12,233</b>

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

We anticipate that the information collection requirements described in this submission will be performed by administrative type staff at the State agency level. According to the Bureau of Labor Statistics, the average compensation cost per hour for state employees was \$50.89 in March 2019. The base annual cost to States of the reporting requirements is estimated to be \$622,537. Including 33% for fringe benefits, the fully loaded cost is estimated to be \$807,974. However, the Department funds SNAP E&T programs through \$103.9 million in E&T grants and an additional \$20 million in grants for State agencies that pledge to serve all ABAWDs at-risk of losing eligibility due to time-limited participation. In addition to these grants, the Department reimburses State agencies for 50 percent of approved administrative costs beyond the E&T grant. Therefore, the cost to States for implementation and ongoing reporting of performance measures may be paid for in their entirety by their Federal grant. As such, the Department estimates the net cost to State agencies for these activities is \$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 annual estimated cost to the Federal government to review and analyze outcome data provided by State agencies is \$7,617.15. FNS has calculated the cost as follows.

Using the 2019 GS Salary Table, we estimate it takes two hours for a GS-13 (step 5) to review and analyze the outcome data provided by each of the 53 State agencies for a total of \$5,727.18 (2 hours x \$53.03 an hour x 53 State agencies = \$5,727.18). Adding in 33% for fringe benefits, that brings the total cost to \$7,617.15.

**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 an extension, without change, for a currently approved data collection. There are no changes to the information collection since the last OMB approval.

**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 for tabulation and publication of this information 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.**

We are not seeking approval concerning the display of the expiration date.

**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.