

Supporting Statement for
Paperwork Reduction Act Submission
OMB No. 0584-0083

Operating Guidelines, Forms, and Waivers

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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 information collection request. During the last renewal, The reporting burden hours for FNS-366A Budget Projection and FNS-366B Program Activity Statement is approved and maintained under of the Food Programs Reporting System (FPRS) 0584-0594, Expiration Date: 7/31/2023; although this collection still uses these forms as supplemental data collection tools, we are changing the title of this information collection since those forms are officially approved under the FPRS OMB control number; therefore, FNS has removed the form numbers from the title of this collection. All other reporting outside these forms and any recordkeeping will remain in this collection. Additionally, this revision includes recordkeeping hours for the FNS-388 and the FNS-388A forms. The reporting burden for these forms is currently captured under the aforementioned FPRS information collection, and the recordkeeping hours are captured under a separate OMB approval number (0584-0081, expiration date 8/30/20). To improve operational efficiency and streamline the agency's information collection portfolio, FNS is merging the recordkeeping hours for the FNS-388/FNS-388A into this information collection and will submit a discontinuation request for 0584-0081; furthermore, this was not mentioned in the 60dayFRN; however, the annual burden hours and total annual responses will be included in the 30dayFRN.

Primarily, this information collection package consists of the following major components of State agency reporting: a budget projection statement collected and submitted by States into

FPRS using FNS-366A, a program activity report collected and submitted by States into FPRS using FNS-366B, a monthly report of benefit issuance and participation data by State using FNS-388, a semi-annual report of benefit and participation data by project area using FNS-388A, State plans of operation updates, and other plans and submissions such as advance planning documents for information systems and for electronic benefit transfer (EBT) systems.

Budget Projection Statement, Program Activity Report, and State Plan of Operation Updates

Under section 16 of the Food & Nutrition Act of 2008 (the Act), 7 U.S.C. 2025, the Secretary is authorized to pay each State agency an amount equal to 50 percent of all administrative costs involved in each State agency's operation of the Supplemental Nutrition Assistance Program (SNAP). Under corresponding SNAP regulations at 7 CFR 272.2(c), State agencies are required to submit to FNS for approval a Budget Projection Statement and maintain Form FNS-366A, which includes projections of the total Federal costs for major areas of program operations. The budget projection allows FNS to estimate funding needs so we can fund the State administrative costs for the fiscal year, and a Program Activity Statement (Form FNS-366B), which provides a summary of SNAP operations during the preceding fiscal year. The activity report and maintenance of this form is required annually to substantiate the costs the State agency expects to incur during the next fiscal year. It provides data on the number of applications processed, number of fair hearings conducted by the State agency and fraud control activity. FNS uses the data to monitor State agency activity levels and performance. This OMB collection reflects a summary of totals reported by State agencies for Certifications (currently reported under OMB Control No.: 0584-0064, Expiration Date 10/30/20), Fraud Investigations (0584-0587, Expiration Date 02/28/2023), Administrative Disqualification Hearings, Fair Hearings, and Prosecutions

(currently reported under OMB Control No.: 0584-0492, Expiration Date: 03/31/2021). None of the activities in this information collection will occur without an OMB control number. Not all activities referenced as associated with this information collection request are currently associated with an OMB number. FNS is currently in the process of ensuring all activities outside this request will become associated with an OMB number.

In accordance with section 11(d) of the Act, 7 U.S.C. 2020, State agencies are also required to submit a Plan of Operation specifying the manner in which SNAP will be conducted within the State in every political subdivision. Section 11(e) of the Act provides that the State plan of operation shall provide for State agency verification of household eligibility prior to certification, completion of certification within 30 days of the filing of the application, fair hearings, submission of reports as required by the Secretary, and other provisions as may be required by regulations. Section 16(a) of the Act authorizes 50 percent Federal reimbursement for State agency costs to administer the program. Part 272.2(a) of SNAP regulations requires that State agencies plan and budget program operations and establish objectives for the next year. The basic components of the State Plan of Operation are the Federal/State Agreement, the Budget Projection Statement, and the Program Activity Statement (272.2(a)(2)). Under Part 272.2(c), the State agency shall submit to FNS for approval a Budget Projection Statement (which projects total Federal administrative costs for the upcoming fiscal year) and a Program Activity Statement (which provides program activity data for the preceding fiscal year). In addition, certain attachments to the plan as specified in subparagraphs (c) and (d) are to be submitted and maintained. As specified in subparagraph (f), State agencies only have to provide FNS with changes to these attachments as they occur. Consequently, these attachments are considered

State plan updates.

Issuance and Participation Reports

Section 18(b) of the Act as amended August 14, 1979 by Pub. L. 96-58 requires that “In any fiscal year, the Secretary shall limit the value of those allotments issued to an amount not in excess of the appropriation for such fiscal year.” If in any fiscal year the Secretary finds that the program costs in participating States will exceed the appropriation, the Secretary shall direct State agencies to reduce the value of allotments to participating households to the extent necessary to stay within appropriated funding limits. Timely State monthly issuance estimates are necessary for FNS to ensure that it remains within the appropriation and will have a direct effect upon the manner in which allotments would be reduced when necessary. The estimates will also have a direct effect upon the manner in which allotments would be reduced if necessary. Under 18(d) of the Act the Secretary is required to report to Congress the basis of the Secretary’s determination to reduce allotments, the manner in which the allotments will be reduced, and the action taken by the Secretary to reduce the allotments. In 1998, Section 101 of the Federal Reports Elimination Act of 1998 (Pub. L. 105-362) amended Section 18(a) of the Act to drop the prior requirement in the law that the Secretary report monthly to Congress the issuance data for the second preceding month along with a statement whether there is reason to believe that reductions in the value of allotments issued to households certified to participate in the Supplemental Nutrition Assistance Program (SNAP), will be necessary. Although the monthly report to Congress has been abolished, the need to monitor issuance estimates monthly against the appropriation remains in order to comply with Section 18(b).

Part 274.4(c)(2) of the SNAP regulations requires State agencies to submit on a monthly basis the FNS-388, State Issuance and Participation Estimates. State agencies are required to report estimated or actual issuance and participation data for the current month and previous month, and actual participation data for the second preceding month. The same regulations require State agencies to submit twice a year (March and September) an attachment (FNS-388A) that includes project area breakdowns of benefit issuance person participation data for the second preceding months of January and July.

Advance Planning Documents for Information Systems

Under Section 11(o) of the Act and SNAP regulations at 7 CFR 277.18, each State agency is required to develop and submit plans for the use of automated data processing (ADP) and information retrieval systems to administer SNAP. We estimate that up to 53 State agencies may submit on an average of four (4) APD. Section 16(a) of the Act authorizes partial Federal reimbursement of State costs for State ADP systems that the Secretary determines will assist meeting the requirements of the Act, meets conditions prescribed by the Secretary, are likely to provide more efficient and effective administration of the program, and are compatible with certain other Federally-funded systems. Under 7 CFR 277.18(c)(1) of SNAP regulations, State agencies must obtain prior written approval from FNS when it plans to acquire ADP equipment with a total acquisition cost of \$5 million or more in Federal and State funds. The State agency must submit and maintain Advance Planning Document (APD) prior to acquiring planning services and an Implementation APD prior to acquiring ADP equipment or services.

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.

Budget Projection (FNS-366A): Under FPRS OMB Control No.: 0584-0594 (Expiration Date: 07/31/2023 currently under OMB review), State agencies are required to submit to FNS for approval a Budget Projection Statement, Form FNS-366A, which includes projections of the total Federal costs for major areas of program operations. The budget projection allows FNS to estimate funding needs so we can fund the State administrative costs for the fiscal year. However, recordkeeping requirements for these forms remain in this collection OMB Control Number OMB control number 0584-0083.

Program Activity Statement (FNS-366B): Again, under FPRS OMB Control No.: 0584-0594, Expiration Date: 07/31/2023 currently under OMB review, State agencies are required to submit to FNS a Program Activity Statement, Form FNS-366B, providing a summary of program activity for the State agency's operations during its preceding fiscal year. The activity report is required annually to substantiate the costs the State agency expects to incur during the next fiscal year. Recordkeeping requirements for these forms remain in this collection OMB Control Number OMB control number 0584-0083. It provides data on the number of applications processed, number of fair hearings and fraud control activity. FNS uses the data to monitor State agency activity levels and performance.

Issuance and Participation Reports (FNS-388 and FNS-388A): The FNS-388 report provides monthly State-wide estimated or actual issuance and participation data for the current and

previous month, and the actual participation data for the second preceding month. For the report months of January and July, the participation data must be categorized as non-assistance (NA) and public assistance (PA) and provided for each project area; this data is provided on the FNS-388A. This NA and PA participation data is captured on the FNS-388A. The reporting burden for the FNS-388 and FNS-388A forms is captured under the FPRS OMB Control Number 0584-0594, Expiration Date 07/31/2023.

The FNS-388 and FNS-388A reports provide the necessary data for an early warning system to enable the Department to fulfill the requirements of Section 18(b) of the Act. In addition, the FNS-388 and FNS-388A data is used: (1) to validate the Annual SNAP Household Characteristic Survey (OMB No.: 0584-0299, Expiration Date: 07/31/2023); (2) to compile a Statistical Summary Report which is used for special studies and in response to Congressional and other inquiries; and (3) to compare against the reconciliation points' titled Issuance Reconciliation Report FNS-46 (OMB# 0584-0594, expiration date 07/31/2023) issuance data (for electronic benefit transfer (EBT), cash-out, and alternative issuance) for indications of accountability problems. FNS has used the project area data to determine where to demonstrate pilot projects also uses the PA and NA data for determining reimbursement of the administrative costs for certification of joint Temporary Assistance for Needy Families/SNAP cases.

State Plan of Operation Updates & Waiver Requests:

State agencies submit the operations planning documents to the appropriate FNS regional office for approval. This information explains how States are operating the program for monitoring purposes and allows FNS to know which States have implemented which activities and options

for data and cost analysis purposes. State agencies administering SNAP may also submit formal written requests, SNAP waiver requests, to obtain approval from FNS to deviate from a specific program rule or regulation SNAP waiver requests fall into two broad categories based on statutory or regulatory authority.

1. *Demonstration Waivers:* Section 17(b) of the Act, 7 U.S.C. 2026(b), the Secretary may waive certain requirements of the Act to test program changes that might increase the efficiency of SNAP and improve the delivery of SNAP benefits to eligible households.

Waivers of provisions of the Act are referred to as demonstration waivers.

2. *Administrative Waivers:* The FNS Administrator may authorize waivers to deviate from specific regulatory program requirements per 7 CFR 272.3(c) and 273.21(a). Waivers of the regulations are referred to as, administrative waivers and are the most common waiver requested by States and approved by FNS.

Under current procedures, State agencies may request SNAP waivers by submitting formal written requests to FNS Regional SNAP Directors. FNS is currently developing WIMS (The Waiver Information Management System), an online database and workflow system to streamline waiver processing that will be deployed within the first quarter of FY 2021, which will allow State agencies to submit waiver requests electronically. Under the currently approved ICR, this system was known as SWIM (SNAP Workflow Information Management), however under this updated ICR it will be referred to as WIMS.

Advance Planning Documents: Under 7 CFR 277.18(c)(1) the Advance Planning Documents (APD) for State automated data processing and information systems are useful to FNS because they explain how the system will work and help explain the estimated cost of the system. The testing plan itself does not require approval. However, under 7 CFR 277.18(c)(1) it must be submitted via e-mail so that FNS can make a sound determination as to the validity of the test results and the State's decision to proceed to pilot, which does require FNS concurrence. The information allows FNS to determine whether the system meets the statutory criteria for approval for Federal reimbursement.

Financial Reporting: FNS requires State agencies to report expenditures for administrative costs and cash-out benefit costs using SF-425 in conjunction with the FNS 366-A which requests Federal funding. A copy of all forms discussed in this request are maintained for 3 years.

The burden estimates cleared under SF-425 Federal Financial Report 4040-0014), OMB Control No.: 4040-0014; Expiration date: 2/28/2022)]; however, the estimates are no longer included as part of this FNS collection, FNS submitted a Request for Common Forms (RFC) associated with OMB Control Numbers: 0584-0512, Expiration Date: 07/31/2022 and 0584-0594, Expiration Date: 07/31/2023 .

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.

Currently, States submit electronic FNS-366A, FNS-366B, FNS-388, FNS-388A, and SF-425 reports via the Food Programs Reporting System (FPRS) (OMB number 0584-0594 expiration 07/31/2023) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>. Because budgets come in before and for the upcoming fiscal year while program activity reports come in after the completed fiscal year, the time frames for the two reports in this submission are different by necessity. In fiscal year (FY) 2018, 100% of these responses on the forms mention above were submitted electronically.

The Waiver Information Management System (WIMS) to streamline FNS waiver processing is currently in development and is expected to be implemented by the first quarter of FY 2021. WIMS does not modify the currently approved burden hours in any way and States will continue to submit the SNAP Waiver Requests (Appendix G) via email until this system is operational, and then States will submit this waiver electronically through WIMS. In the meantime, States are submitting waivers via a waiver request to the FNS Regional SNAP Directors.

Currently, States submit the request for administrative review of ADPs via electronic mail. This request is an official memorandum, signed and provided by the requestor in portable document format (PDF). In fiscal year (FY) 2019, 100% of these plans were submitted via email.

Therefore, zero percent of this data collection is submitted through electronically through a web-based system.

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 that the program is being efficiently and economically operated.

The FNS-366A, which includes projections of the total Federal costs for major areas of program operations, is submitted prior to the start of the fiscal year and is necessary as part of the budget approval process. State agencies report actual cost data to FNS after the fact; actual cost data is not duplicative of the data collected on the FNS-366A.

The FNS-46 also collects issuance data currently approved under Food Programs Reporting System (FPRS) – OMB Control No. 0584-0594 Expiration 07/31/2023. However, the issuance data reported on the FNS-46 involves reconciled (actual) issuance, is collected from reconciliation points, and is due 90 days after the report month. The FNS-388 issuance and participation data is derived from State agencies' master files of each household's issuance activity and is reported on the 19th day of the report month. By collecting from these sources we can verify the accuracy of the State agencies reporting and reconciliation systems. While the FNS-46 data is somewhat similar, the need for timely data requires the FNS-388 report so the Department can fulfill its mandated responsibility of determining in advance the latest cost of the program and whether benefit reductions will be necessary.

FNS currently requires State agencies to report Disaster SNAP issuance and participation data using form FNS-292B Report of Disaster Supplemental Nutrition Assistance Program Benefit Issuance. Form FNS-292B must be submitted to the agency within 45 days of the termination of a Disaster SNAP operation and captures final issuance and participation data. The information collection burden for the recordkeeping of FNS-292B is included in OMB 0584-0037, expiration date 2/28/2021. The reporting burden estimates are currently approved under Food Programs Reporting System (FPRS) – OMB Control No. 0584-0594 Expiration 07/31/2023. Submission of the FNS-292 cannot be required any more frequently than 45 days post-termination of an event. Monthly SNAP data is collected on FNS-388, but does not duplicate any data collection currently in place, as the FNS-292B serves as a final summary and closeout of the disaster response period and is not meant to provide periodic updates.

In order to eliminate duplication on APDs, FNS works closely with the Department of Health and Human Services on integrated systems affecting both Departments. The State agency submits the same documentation to each Department concurrently. Coordination of decisions and responses to State requests for approval are executed between the two Departments routinely.

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, Local, or Tribal Government Agencies are involved in this data

collection effort, they delivered the same program benefits and perform the same function as any other State Agencies. Thus, they maintain the same kinds of information on file. There are no other entities involved with this data collection.

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 information collection. Form FNS-366A is submitted annually by August 15 for the upcoming fiscal year and Form FNS-366B is submitted no later than 45 days after the end of each State agency's fiscal year. Less frequent reporting would disrupt budget planning and delay appropriation distributions. State Plans of Operation are a one-time effort with updates provided as necessary.

In order to monitor benefit expenditures against the appropriation and determine whether a benefit reduction will be necessary during the fiscal year, as required by Section 18(b) of the Food and Nutrition Act, it is necessary that the FNS-388 collect and maintain records for issuance data monthly and that the FNS-388A collect project data semi-annually (January and July) to ensure program integrity. Less frequent reporting would render the data inadequate for making timely projections and taking action to notify State agencies to initiate benefits reductions to fulfill the requirements of Section 18(b) of the Act.

The frequency of the APD requirement is at the discretion of respondents and their need to apply for Federal Financial Participation for the cost of their ADP equipment and services acquisition.

These documents allow FNS to determine whether the system meets the statutory criteria for approval for Federal reimbursement. Without these documents FNS would not be able to verify and ensure State integrity or compliance with statutory criteria and we would not be able to monitor State agency activity levels and performance.

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 require the information to be collected 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 December 2, 2019, FNS published in the Federal Register a 60-day notice (84 FR 65965) regarding this information collection. Comments were solicited on this information collection as part of the comment period of the notice. Three comments (included with this request in Appendices B.1-B.3) were received. However, none of the comments were directly related to this proposed information collection request.

FNS consults with Regional Offices regarding any proposed changes as a result of regulatory changes. Regional offices are in constant contact with State agencies which provides feedback on FNS processes and procedures that may impact them. For this Information Collection request, FNS contacted one State agency official that works closely Program Summary and Budget forms in each of the following States: Nebraska Department of Health and Human Services (Melissa Weyer, Division of Children and Family Services, Melissa.weyer@nebraska.gov), Missouri Department of Social Services (Dana Carrington, Chief of Investigations, Dana.Carrington@dss.mo.gov), Colorado Department of Human Services (Laura Hennings, laura.hennings@state.co.us). These State agency contacts were sent the Federal Register Notice and asked to share any feedback on the information collected related to Forms FNS-366A and FNS-366B, Program and Budget Summary Statement to include their views on the

recordkeeping. They have not submitted any feedback on the information collection as of June 24, 2020.

FNS made the decision to merge 17 the burden hours for 0584-0081 into this collection after the 60 day notice for 0584-0083 published, therefore they were not included in the notice. However, the FNS-388 and FNS-388A records are kept by the same State agencies and the recordkeeping activities are essentially the same. We are merging this information collection for operational efficiency.

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.

Although there is no actual personal identifiable information collected under this OMB control number per Appendix C: System of Records Notice (**Federal Register** /Vol. 65, No. 63 / Friday, March 31, 2000) , FNS complies with the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. This ICR has been reviewed and cleared by Miguel Marling, FNS Privacy Officer.

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.

The total number of respondents and affected public is 53 State, Local and Tribal Government Agencies. The estimated reporting time per response per State Agency is 2.3876 for a total estimated annual reporting burden hours of 1056.04 for reporting and recordkeeping. See the table below for a breakdown in estimates. There is no third party disclosure associated with this information collection. This OMB collection reflects a summary of totals reported by State agencies for Certifications (currently reported under OMB Control No.: 0584-0064, Expiration Date 10/30/20), Fraud Investigations (0584-0587, Expiration Date 02/28/2023), Administrative Disqualification Hearings, Fair Hearings, and Prosecutions (currently reported under OMB Control No.: 0584-0492, Expiration Date: 03/31/2021).

The burden consists of eight major reporting components. It covers (1) the FNS-366A, (2) the FNS-366B, (3) SF 425-788 Financial reporting, (4) the FNS-388, (5) the FNS-388A, (6) the

State Plan of Operation updates, (7) :SNAP Waiver requests submitted as attachments to the FNS-366B, (8) other Advance Planning Documents (APD) and update submissions. We are not requesting the reporting burden hours for FNS-366A, FNS-366B, FNS-388, FNS-388A, or SF-425 since these are already approved under the FPRS information collection request.

However, there are other reporting burden 1056.04 and 68.13 recordkeeping burden hours for a grand total of 1124.17 burden hours we are requesting under this collection. The calculation of the burden for each of these components is described below:

Reporting cleared under OMB Control #0584-0594 (Expiration 07/31/2023):

- o **FNS-366A. Fifty-three (53) State Agencies (SA) submit 1 response annually for a total of 53 annual responses. At 12.92 hours per response, the annual burden for the FNS-366A is 685 hours.**
- o **FNS-366B. Fifty-three (53) SA submit 4 responses annually for a total of 212 annual responses. At 15 hours per response, the reporting burden is 3,180 hours.**
- o **FNS-388: Fifty-three (53) SA submit 12 responses annually for a total of 636 responses. At 5.6 hours per response, the reporting burden is 3,561.6 hours.**
- o **FNS-388A: Fifty-three (53) SA submit 2 responses annually for a total of 106 responses. At 14.83 hours per response, the reporting burden is 1,572 hours.**

Reporting cleared Under OMB Control #4040-0014 (Expiration 2/28/22):

SF 425 - Financial Reporting. 53 State agencies submit 1 report quarterly for a total of 212 annual responses. At 1.50 hours per response, the reporting burden is 318 hours annually.

Reporting remaining in 0584-0083:

Plan of Operation Updates. Fifty-three (53) State agencies submit 1 response annually for a total of 53 annual responses. The reporting burden for submission of updates to State Plans of Operation is 6.5847 hours per respondent, resulting in estimated burden hours of 348.99 (53 x 6.5847 = 348.9891).

SNAP Waiver Request. Approximately 45 State agencies will submit 3.94336 SNAP Waiver Requests annually for a total of 177.453 (45 x 3.94336 = 177.453). The estimated average number of burden hours per submission is 1 hour resulting in estimated total burden hours of 177.453.

Other Plans and Submissions. We estimate that up to 53 State agencies may submit on an average of four (4) APD, plan, or update submission for a total of 212 annual responses at an average estimate of 2.5 hours per respondent. The reporting burden is 530 hours.

| | | | Reportin g | | | | | | |
|---------------------|--------------------------------------|--------------------------------|------------------|------------------------------|------------------------------|----------------------------------|-------------------------------|---|----------------|
| Affected Public | Burden Activities | Forms | CFR Citations | Number of Respondent s | Frequenc y of Response | Total Annual Response s | Time per Response (hrs) | Annual Reportin g Burden Hours | Ho R Rei |
| | Plan of Operation s | | 272.2 | 53.00 | 1.00 | 53.00 | 6.58 | 348.74 | |
| State Agencies | Other APD Plan or Update | | 277.18 | 53.00 | 4.00 | 212.00 | 2.50 | 530.00 | |
| | SNAP Waiver Requests (WIMS) | SNAP Waiver Templat e | 272.3 (b)(c) | 45.00 | 3.94 | 177.30 | 1.00 | 177.30 | |
| Reportin g Total | | | | 53.00 | 8.35 | 442.30 | 2.3876 | 1056.04 | |

| | | | | | | | | | |
|------------------|--|--|--|--|--|--|--|--|--|
| Burden Estimates | | | | | | | | | |
|------------------|--|--|--|--|--|--|--|--|--|

Recordkeeping:

| Affected Public | (b) Form No. or Activity | (c) Number Recordkeepers | (d) Number Records per Respondent | (e) Estimate Total Annual Records (cxd) | (f) Hours per Recordkeeper | (g) Total Burden (exf) | Hourly Wage Rate @ 50% Reimbursement | Total Reimbursement |
|--------------------------------------|----------------------------|--------------------------|-----------------------------------|---|----------------------------|------------------------|--------------------------------------|---------------------|
| State Agencies | FNS - 366A | 53.00 | 1.00 | 53.00 | 0.05 | 2.65 | 18.78 | |
| | FNS - 366B | 53.00 | 4.00 | 212.00 | 0.05 | 10.60 | 18.78 | |
| | FNS - 388 | 53.00 | 12.00 | 636.00 | 0.024 | 15.26 | 18.78 | |
| | FNS - 388A | 53.00 | 2.00 | 106.00 | 0.024 | 2.54 | 18.78 | |
| | Plan of Operations Updates | 45.00 | 1.00 | 45.00 | 0.07 | 3.15 | 18.78 | |
| | SF425 | 53.00 | 4.00 | 212.00 | 0.05 | 10.6 | 18.78 | |
| | Other APD Plan or Update | 53.00 | 4.00 | 212.00 | 0.11 | 23.32 | 18.78 | |
| Recordkeeping Total Burden Estimates | | 53.00 | 27.85 | 1476.00 | 0.04616 | 68.128 | 18.78 | |

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

Annual respondent cost with fully loaded wages is estimated at **\$28,079**. This includes the 50 percent of all administrative costs involved in each State agency’s operation of the program as well as the addition of 33 percent of wage costs to account for fringe benefits. The estimate of respondent cost is based on the burden estimates developed in 12(a) above. Based on the Bureau of Labor Statistics May 2019 Occupational Employment and Wages Report (<https://www.bls.gov/oes/current/oes130000.htm>), hourly mean wage for budget analyst functions performed by State and local agency staff are valued at \$37.56 per staff hour.

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/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 combined estimated total annualized cost to the Federal Government is **\$31,231.60** including 33 percent of the annual base cost to respondents to capture fully loaded wages. This cost includes \$28,079 reimbursable rate paid to State agencies + \$3,152.6 the total cost of Federal workers (\$827.40 for FNS Management analyst and \$2,325.20 for FNS Branch Chief). The breakdown of the costs are identified below.

The Federal cost also includes the cost associated with the preparation of this information collection package. This includes Federal worker time at FNS for the following:

| | Hours | Hourly Wage* | Total |
|--------------------------|-------|--------------|-----------|
| GS-12 Management Analyst | 20 | \$41.37 | \$827.4 |
| GS-14 Branch Chief | 40 | \$58.13 | \$2,325.2 |

Cost of Federal workers:

\$3,152.6

*Wage rates determined in accordance with the Office of Personnel Management's salary table for 2020 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf)

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The total cost to the Federal government takes the total State governmental costs for recordkeeping: \$55,268 minus 50% reimbursable cost attributed to the Federal government share is \$28,079 plus cost of Federal workers staff hours to draft, review, approve, manage, maintain and implement this information collection = \$3,152.60 gives a total **cost to the Federal government: \$31,231.60**

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 currently approved collection. The current burden inventory for this information collection request is 1,119 total annual burden hours and 845 total annual responses. FNS is requesting 1,124.17 burden hours and the total annual responses are 1,918. The revised burden estimates have increased from 1,119.54 to 1,124.17 burden hours, for an overall increase of 4.63 burden hours. This increase is attributed to the addition of recordkeeping hours for the FNS-388 and FNS-388A.

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.

This data is included in the annual SNAP State Activity Report that is produced for and used by FNS for analysis and evaluation purposes. The report also published on the USDA FNS website at <http://www.fns.usda.gov/pd/snapmain.htm>. The report is usually published in the first quarter of the calendar year. Utilizing data collected from the FNS-388A, FNS also prepares periodically a "SNAP Statistical Summary of Project Area Operations Report" which provides the Public Assistance and Non-assistance participation by project area.

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.