

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

SNAP Implementation of Families First Coronavirus Response Act of 2020

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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.

The Families First Coronavirus Response Act of 2020 (P.L. 116-127), enacted March 18, 2020, includes a general provision that allows the Department of Agriculture to approve state plans to provide temporary emergency Supplemental Nutrition Assistance Program (SNAP) assistance to households with children who would otherwise receive free or reduced-price meals if not for their schools being closed due to the COVID-19 emergency (also known as Pandemic EBT, or P-EBT). This legislation also provides for the issuance of emergency allotments (supplements) based on a public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public Health Service Act related to an outbreak of COVID-19 when a State has also issued an emergency or disaster declaration.

The Agriculture Improvement Act of 2018 (P.L. 115-334) required the use of online transactions for the redemption of SNAP benefits. This requirement allows SNAP authorized retailers to redeem SNAP benefits through online retailer websites in one or more State(s). The implementation phase of this requirement began April 28, 2019, with six States participating. Due to the COVID-19 Coronavirus pandemic, States, retailers, and SNAP participants are seeking additional ways to obtain and distribute food while practicing social distancing. Expanded online purchasing options for SNAP is one such solution. In response to the COVID-19 challenge, FNS will encourage additional States to propose providing online purchasing as an option to SNAP participants. The State's proposal will be submitted as an addendum to their State Plan (Attachment D), and the addendum should demonstrate that the State has the capacity

to implement online purchasing and understand the risks inherent in an expedited implementation. Each State plan addendum should confirm that the State has engaged their EBT processor and their retailer community and have tested their systems to ensure a smooth operation of online purchasing.

This submission seeks emergency OMB approval of activities associated with administering P-EBT, emergency allotments, and expanding SNAP online purchasing opportunities. The Food and Nutrition Service (FNS) cannot reasonably comply with the normal clearance procedures under the PRA because complying would delay the agency's ability to provide emergency nutrition assistance to families and children impacted by COVID-19. As such, we request expedited approval of this information collection.

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.

This is a request for a new OMB control number. The information collection is necessary to ensure that households impacted by COVID-19 receive emergency food assistance.

P-EBT

As authorized by Families First Coronavirus Response Act of 2020, States impacted by COVID-19 will have the ability to issue P-EBT benefits to SNAP (currently participating in SNAP) and non-SNAP (not currently participating in SNAP) households with children who have temporarily lost access to free or reduced-price school meals due to pandemic related school closures. These households are eligible for P-EBT if they meet the following eligibility standards:

- Households include a child or children, who if not for the closure of their school due to a COVID-19 outbreak, would have received a receive free or reduced-price school meals under the Richard B. Russell National School Lunch Act, as amended, and
- The child's school or district will be (or has been) closed due to pandemic for at least 5 consecutive days.

The household allotment amount will be no less than the value of school meals at the free rate over the course of five (5) school days for each eligible child in the household. The value of the school meals is equal to the Federal reimbursement rate for breakfast and lunch at the free rate.

For households (with school age children) currently receiving SNAP benefits, no application is required, and the State will be able to provide the P-EBT benefit without contacting the household. State agencies will be required to obtain enrollment data from local educational entities to determine the number and identity of children eligible to receive P-EBT benefits and match them to an existing SNAP case, where applicable. In instances where P-EBT eligible children are not part of an existing SNAP household, the State agency will require the non-participating household to complete a SNAP application prior to providing benefits to ensure the State agency has the following information:

- Name and signature of the head of household
- Number and names of eligible children in the household
- Address of household on record with the school district
- Mailing address if different than address on record with the school district

In order to begin operating P-EBT, each State agency is expected to submit a State plan to their FNS Regional Office for approval (Attachment B). Once approved, in addition to administering P-EBT, each State SNAP agency will also be required to provide monthly reports via the FNS-388 to the FNS Regional Office, regarding the number of eligible children receiving P-EBT benefits, number of households receiving such benefits, and the total value of the benefits. The State is expected to provide data that:

- differentiates between non-SNAP and current SNAP households receiving P-EBT,
- within SNAP households, differentiate between base SNAP benefits and P-EBT benefits.

The burden for a State agency to submit FNS-388 and FNS-46 reports is currently captured under the information collection for the Food Programs Reporting System (FPRS), OMB Control

Number 0584-0594 (expiration date 3/31/20; renewal package currently under OMB review).

Emergency Allotment

As authorized by Families First Coronavirus Response Act of 2020, State agencies impacted by COVID-19 may submit a waiver request (Attachment C) to their FNS Regional Office for approval to provide an emergency allotment to households to bring all households up to the maximum benefit due to pandemic related economic conditions. State agency waivers will generally be approved under one or more the following conditions as it relates to COVID-19:

- Residents of the State are confirmed to have contracted COVID-19
- Some or all areas of the State are containment or quarantine zones
- Businesses have closed or significantly reduced their hours
- The State's residents have experienced economic impacts due to job suspensions or losses
- The State's residents have been directed to practice social distancing

Once the State's waiver has been approved, for existing SNAP households, the State may provide the emergency allotment without contacting the household.

SNAP Online Purchasing

The State's proposal will be submitted as an addendum to their State Plan (Attachment D), and the addendum should demonstrate that the State has the capacity to implement online purchasing and understand the risks inherent in an expedited implementation. Each State plan addendum should confirm that the State has engaged their EBT processor and their retailer community and have tested their systems to ensure a smooth operation of online purchasing.

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.

In compliance with E-Government Act of 2002 (E-Gov), State agencies have the authority to use the technology that best suits the needs of their individual or unique systems of operation to comply with the reporting and recordkeeping requirements contained in this submission. FNS has made every effort to provide for electronic submission as an alternative to paper submission in compliance with the E-Gov. FNS provides funding to support the development of electronic systems through Federal matching of States' administrative costs.

All State agencies have automated their SNAP eligibility systems. States send aggregate level data on participation, benefits issued, and other basic program information to FNS using the Food Programs Reporting System (FPRS) via this website: <https://fprs.fns.usda.gov>. FNS does not receive client-specific data, such as applications or individual case records. It is estimated that most households will be able to apply electronically for P-EBT. The State processing of P-EBT and emergency allotments is fully electronic. State submission of waiver requests is fully electronic.

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.

States are required to limit any collection of information to only what is necessary to comply with statutory SNAP requirements and to protect program integrity without imposing undue burden on respondents. Because of the numerous Federal or State means-tested programs with

variations in eligibility rules and benefit criteria, duplication of information collection and reporting may result for both States and households.

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.

This collection does not have a direct impact on small businesses or other small entities. State agencies administer SNAP at the State level and collect the necessary data to ensure correct eligibility determinations and delivery of benefit. Of the 53 SNAP State agency respondents, none are small entities.

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.

In order to certify households for SNAP under pandemic circumstances, the collection of certain information is necessary. FNS has limited the collection of information to the minimum amount required to comply with the intent of standards set forth in the Food and Nutrition Act of 2008, as amended. Additionally, if the necessary information is not collected, participating households in P-EBT could not be properly tracked, resulting in the over- or under-issuance of benefits to ineligible households.

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.**

The weekly and monthly reporting of P-EBT participation and emergency allotments is standard for disaster/event protocols and is intended to assist with accurately tracking and reporting activity to Congress and the Executive Office of the President.

There are no other 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.

Because this is an emergency clearance request and all State partners are operating at maximum capacity on COVID-19 related matters, FNS has not consulted on this information collection or

associated burden estimates. Should an ongoing information collection be needed following the expiration of this emergency IC, FNS commits to consulting on those prior to submitting the full 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.

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.

Section 11(e)(8) of the Act and 7 CFR 272.1(c) of SNAP regulations limit the use or disclosure of information obtained from applicant households or contained in case files of participating households to persons directly connected with the administration of SNAP, such as: other Federal or federally-assisted means-tested programs; persons directly connected with the verification of immigration status of aliens; the Office of the Comptroller General of the U.S. for audit and examination authorized by any other provisions of law; local, State, or Federal law enforcement officials for the purpose of investigating an alleged violation of the Act or regulations; agencies of the Federal Government for purposes of collecting the amount of an over issuance from Federal pay; and any Federal, State or local law enforcement officer if a household member is a fleeing felon or a parole violator. The application for benefits contains personal identifying information on individuals doing business with FNS. Therefore, FNS published a Privacy Act Notice System of Records Notice (SORN) March 31, 2000, entitled USDA/FNS-10: Persons Doing Business with the Food and Nutrition Service, in the Federal Register (65 FR

17251) to specify the uses to be made of the information collected.

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.

No private or sensitive questions will be asked.

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.

P-EBT and Emergency Allotments

FNS expects 53 State agencies will submit one waiver each for the P-EBT option and the emergency allotment. Each response should take approximately one hour to complete.

Currently, there are 29 million children (16.1 million households) participating in free and reduced price meal programs. Of those, about 14 million children are in SNAP-participating households and would receive P-EBT automatically without the need for a household application. The remaining 15 million children (approximately 8.3 million households) may be eligible for P-EBT, and each household would need to submit an application to the State agency to receive the benefit. Each State agency has a unique application. The State agency will then need process each application.

SNAP Online Purchasing

Currently, six states have implemented SNAP online purchasing. The remaining 47 States may express interest in participating due to COVID-19 conditions. State participation and, thus, submission of the State Plan Addendum is voluntary. FNS estimates that completing the State Plan Addendum will take 10 hours to complete.

The total requested burden hours for this collection is 3,459,545. See table below for calculations.

Respondent Category	Instruments	Form	Number of respondents	Frequency of response	Total Annual responses	Responses per Respondent	Hours per response	Annual burden (hours)
Individuals / Household	P-EBT Application Submission		8,300,000	1	8,300,000	1	0.16666667	1,383,333.30
State Agencies	State Plan Submission - Online Purchasing	Attachment D	47	1	47	1	10	470
	State Plan Submission- P-EBT	Attachment B	53	1	53	1	1	53
	P-EBT Application Processing	N/a	53	1	8,300,000	156,604	0.25	2,075,000.00
	Weekly P-EBT Reporting to FNS	N/a	53	12	636	12	1	636.00
	Waiver Request - Emergency Allotment	Attachment C	53	1	53	1	1	53
	SA Subtotal		53		8,300,789	156,617.77	0.2501237	2,076,212
Total			8,300,053		16,600,7	2.000082	0.208296	3,459,545

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

SNAP information collection requirements described herein are imposed primarily on State agency eligibility workers and State agency SNAP managers. Standard wage rate categories used in determining annualized burden costs were based on the most recent Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data from May 2018, using the corresponding occupation code 43-4061, Eligibility Interviewers, Government Programs.¹ And occupation code 11-9151, Social and Community Services Managers². According to the most recent BLS data, workers in this occupation earn a median wage rate of \$22.34 per hour and \$34.46 per hour, respectively. States would incur an annualized administrative cost of \$22.34/\$34.46 per hour burden in the information collection. However, fifty percent of administrative costs incurred by State agencies are reimbursed by FNS, which results in a reimbursement value of \$11.17 and \$17.23 per burden hour, respectively. The Federal minimum wage rate of \$7.25 per hour is used to calculate annualized costs for households applying for SNAP benefits.³

A summary of annualized costs for the collection is shown in the table below. A detailed calculation is included in the Burden Table (Appendix A).

Respondent	Cost*
State Agencies and Local Offices	\$30,854,181.57
Households	\$10,029,166.43
Total	\$40,883,348.00

*State agency estimates are inflated by 33% to represent fully loaded wages

¹ <http://www.bls.gov/oes/current/oes434061.htm>;

² <https://www.bls.gov/oes/current/oes119151.htm>

³ <http://www.dol.gov/whd/minimumwage.htm>

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.

FNS does not expect any additional annual cost burden to respondents or recordkeepers.

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.

Fifty percent of the administrative costs incurred by State agencies are reimbursed by FNS. Thus, the estimated wage rates for State agency employees noted above have been reduced by 50% to reflect cost sharing. Costs associated with the burden imposed on SNAP applicants are not reimbursed.

The Federal cost assumes it will take Regional or National Office staff (GS-12 Step 2) approximately 1 hour to review and approve each waiver request. This includes Federal worker time at FNS for the following:

	Hours	Hourly Wage Rate*	Total
GS-12/2 Program Analyst	106	\$42.75	\$4,531.50
+ 33% for Staff Fringe Benefits			\$1,495.40
50% Federal Share of State Cost			\$30,854,181.57
Total Federal Cost			\$30,860,208.47

*Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx)

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 new OMB information collection 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.

There are no plans to publish statistical analyses.

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 this approval.

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."

FNS does not have any exceptions to the certification statement.