

**SUPPORTING STATEMENT - PART A for  
OMB Control Number 0584-NEW:  
FNS Information Collection Needs due to COVID-19**

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## **Attachments**

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Attachment B Families First Coronavirus Recovery Act

Attachment C Example FFCRA SNAP Waiver Request Template

Attachment D Example WIC Waiver Request Template

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Attachment F Justification Memo for Emergency Information Collection Clearance

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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 submission seeks emergency OMB approval of activities associated with State SNAP, WIC, Food Distribution (FD), and Child Nutrition Programs (CN) waiver requests during COVID-19. 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.

As the Food and Nutrition Service (FNS) is responding to the COVID-19 Coronavirus pandemic, it is implementing a number of waivers and program adjustments to ensure Americans in need can access nutrition assistance during the crisis while maintaining recommended social distancing practices. Two pieces of legislation have detailed many of the program adjustments available to FNS. The Families First Coronavirus Response Act of 2020 ([PL 116-127](#)) and the Coronavirus Aid, Relief, and Economic Security (CARES) Act ([PL 116-136](#)) provided a number of program adjustments and additional funding, respectively. The programs' authorizing legislation also allows for some waivers and flexibilities. The statutes describing these waivers and flexibilities also have reporting requirements. The Department is seeking approval of this Emergency Information Collection Request in order to meet the information collection and reporting requirements detailed in the Families First Coronavirus Response Act of 2020, as well as program administration needs to implement the CARES Act of 2020.

Section 2302(a)(2) of the Families First Coronavirus Response Act of 2020 (FFCRA), enacted March 18, 2020, allows the Department of Agriculture to adjust, at the request of State agencies or by guidance in consultation with one or more State agencies, issuance methods and application and reporting requirements under the Food and Nutrition Act of 2008, as amended, (FNA) to be consistent with what is practicable under actual conditions in affected areas. Section 2302(c) of FFCRA requires the Secretary of Agriculture to submit a report to Congress following the end of the public health emergency, including a description of the measures taken to address the food security needs of affected populations during the emergency, including any information or data supporting State agency requests, among other information not included in this information collection (IC).

Further, Section 2203(a)(1) allows State agencies administering the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) to request a waiver of 17(d)(3)(C)(i) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(d)(3)(C)(i)), which requires applicants be physically present in the clinic. Local agencies are required to submit a report detailing the use and benefits of this waiver within one year of use of such waiver, and State agencies are required to submit a summary report of local agency usage of waivers under this Section within 18 months. Section 2204(a)(1) gives State agencies administering WIC and the WIC Farmers Market Nutrition Program (FMNP) the opportunity to request a waiver or modification of qualified regulatory requirements from USDA if such requirements cannot be

met due to COVID-19, and such waivers are necessary to provide assistance to WIC and WIC FMNP participants. State agencies are also required under this Section to provide a report to USDA no later than one year after such waivers were granted, detailing their use of the waiver and how it improved services to women, infants and children.

In addition, Title II of the FFRCA allows a number of adjustments to the Child Nutrition Programs and with those adjustments requires the States to report to the Secretary of Agriculture how they used the waivers and whether they improved services to children. In order to comply with the requirements of the FFRCA, FNS will ask the States to report the required data points on existing FNS forms. These data will be collected electronically using the existing remarks fields in the FNS Food Program Reporting System (FPRS).

In all the instances described above, the information collection includes burden on State agencies for requesting waivers due to COVID-19 and reporting to FNS evaluation data on how the waiver has impacted State operations, which is a requirement on States in FFRCA.

Additionally, FNS is asking State agencies to report the USDA commodities used during a disaster on a more frequent basis. This information is currently collected in an OMB approved form, the FNS-292A, Report of Commodity Distribution for Disaster Relief (OMB Control Number 0584-0594 Food Programs Reporting System, currently under review at OMB). State distributing agencies may release commodity or donated foods procured by the Department of Agriculture (USDA) to disaster organizations to provide nutritional assistance to disaster victims. Under the Code of Federal Regulations (CFR) at 7 CFR 250.69(f), State distributing agencies shall provide a summary report to FNS within 45 days following termination of the disaster assistance, and maintain records of these reports and other information relating to disasters. FNS is seeking to change the frequency of the collection of the commodity reports from 45 days after the completion of the disaster, to a weekly basis. This change is being requested due to the number of requests and the burden of the FNS regional offices. Additionally, this request is being requested in order for FNS Food Distribution (FD) staff to monitor levels of USDA commodities more frequently to ensure States have access to USDA commodities in the coming weeks.

## **A2. Purpose and Use of the Information.**

**Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.**

The information collection described here is necessary to ensure that State agencies are able to continue operations, including eligibility determinations and benefit issuance, under the unique circumstances resulting from COVID-19. As a result, households impacted by COVID-19 will be able to apply for and receive nutrition assistance while still observing social distancing requirements.

The SNAP and WIC requests are for new OMB control numbers. The CN data will be collected in the remarks fields in the existing database system States use when they are submitting existing, OMB-approved forms (FNS10, "Report of School Program Operations", FNS44 "Report of the Child and Adult

Care Food Program”, and FNS418 “Report of the Summer Food Service Program for Children”), so a new OMB control number is not required (all of these forms are currently approved under OMB Control Number 0584-0594 Food Programs Reporting System, which is currently under review at OMB). Instead, FNS is seeking to collect additional information in the current “remarks” section of forms FNS10, FNS44 and FNS418) that was not previously described and approved. The Food Distribution (FD) request is for a change of *frequency* on an already approved form, FNS-292A “Report of Commodity Distribution for Disaster Relief,” thus a new OMB control number is not required (OMB Control Number 0584-0594). Due to the additional information that is being requested and the change in frequency, FNS anticipates needing *more burden hours* than is approved under this existing control number. Thus, FNS is requesting a new OMB control number to cover the additional burden hours. FNS is requesting approval through October 9, 2020. If FNS needs approval past this date or anticipates needing additional burden hours beyond what is approved through this emergency Information Collection, it will make those requests through revising the existing, current OMB control number.

FNS will use the information in three ways:

- 1. Waiver submissions** will enable FNS to quickly and efficiently determine if they can approve waivers requested by the State to operate the nutrition programs during the Public Health Crisis. Submitting a waiver is voluntary – States elect whether or not to request a waiver. The waivers have information needed for quick decision-making. In order to adjust program requirements set forth in the nutrition assistance programs’ statutes and regulations as outlined in the FFCRA, each State agency is expected to submit a waiver request to their FNS Regional Office for approval. As each national waiver flexibility is developed by the National Office, a “blanket” waiver request template will be created for that waiver flexibility and made available to State agencies (example Attachments C, D, E). Should a State agency desire to implement that waiver flexibility, it must notify the Regional Office via e-mail of its intention to implement the waiver, and the Regional Office will approve the waiver request via e-mail. If states choose to elect a waiver, once approved, in addition to operationalizing the waiver, each State agency will also be required to provide waiver evaluation data to the FNS Regional Office for inclusion in the final report to Congress.
- 2. The evaluation data** is required by FFCRA and will be used to report to Congress in required reports how the waivers were used, how many people they reached, and whether or not they improved program efficiency during the Public Health Crisis.
- 3. Monitoring use and distribution of USDA Commodities.** The Food Distribution data collected via Form 292A will enable FNS to monitor distribution of USDA commodities by State education and welfare agencies following disasters. This is being requested in order for FNS Food Distribution (FD) staff to monitor levels of USDA commodities more frequently to ensure States have access to USDA commodities in the coming weeks. Form FNS-292A is used by State distributing agencies to provide a summary report to FNS of disaster commodity food assistance and to request replacement of commodity foods distributed during the disaster or situation of distress. Information collected on FNS- 292A will be used by the FNS Administrator, the Food Distribution Division, to monitor program activity, assess coverage provided to needy recipients, assure the validity of requested commodity reimbursements and to prepare budget requests. Data from Form 292A has been used in the past to report to the Secretary of Agriculture, the Federal Emergency Management Agency, the White House and Congress on FNS disaster relief efforts.

As noted above, much of the information collection already has existing OMB control numbers.

- SNAP and CN have existing OMB Control Numbers to collect waiver information. The burden for **State SNAP waiver** requests is currently approved under OMB Control Number 0584-0083 Operating Guidelines, Forms, and Waivers, Program and Budget Summary Statement (Forms FNS-366A and FNS-366B). SNAP anticipates needing more burden hours for COVID-related waiver collection than is currently approved and is requesting the additional burden hours through this Emergency Information Collection request. Following the expiration of this emergency information collection, should SNAP continue to receive waiver requests associated with COVID-19 above and beyond the type and volume of waivers submitted under normal operations, FNS will revise 0584-0083 to include the FFCRA waivers on an ongoing basis.
- The burden for **CN waivers** is currently approved under OMB control Numbers 0584-0280 7 CFR Part 225 Summer Food Service Program, 0584-0012 School Breakfast Program, and 0584-0006 7 CFR Part 210 National School Lunch Program. CN anticipates that they can process the waivers within the approved burden. Should it need more hours CN will revise that OMB number to include the COVID waivers on an ongoing basis.
- The burden for the **CN forms** is currently approved under OMB control number 0584-0002 and 0584-0594. FNS is seeking to collect additional information on the forms, in the current “remarks” section, that had not been previously approved. FNS will use the remarks section of the approved Forms already in use to collect this required information.
- The burden for **Form 292A** is already approved OMB control number 0584-0594. That approval allows FNS to collect the data once, 45 days after the end of a disaster declaration. FNS is seeking approval to collect the data weekly to ensure it can monitor USDA commodities use and distribution.

### **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.

State submission of waiver requests is a combination of online, fillable forms and submission via email. SNAP waiver requests are submitted as updates to the State Plan and are e-mailed to FNS Regional Offices. Evaluation data will be submitted to FNS Regional Offices via e-mail.

State submission of WIC waiver requests is fully electronic through use of an optional online fillable form; emailed information outside of the form to the FNS Regional Office will also be accepted. Emailed submissions will be entered into the online fillable form by Regional Offices in order to ensure all waiver data is captured in a centralized location for tracking and reporting purposes. Use of this online tracker (Excel-based Sharepoint document) is anticipated to significantly reduce FNS staff burden by housing all State-submitted data in one central location in real-time and allows for rapid analyses and targeted response. State submission of FMNP waiver requests is through email of a fillable Word document.

State submission of data on FNS forms FNS-10, FNS-44, and FNS-418 is also fully electronic. The CN forms require monthly submissions of 30 and 90 day NSLP/SBP, SSO, CACFP, and SFSP data. Two questions will be added to the FNS-10; counts of NSLP/SBP and SSO sites. Four questions will be added to the FNS-44; the number of childcare sites and day care homes that cared for children and provided meals and those that provided only meals. One question will be added to the FNS-418; the number of SFSP sites that opened under COVID-19 waivers.

State submission of the information on FNS-292 A is a fillable form submitted via email. States can email the requested information using a modified spreadsheet to FNS Regional Offices.

Therefore, out of 5,994 responses for this collection, FNS estimates that 3,730 (62 %) will be collected electronically.

#### **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. Because under usual circumstances USDA does not have waiver authority for WIC and the FMNP, the requested data under this collection are unique to the COVID-19 public health emergency and are not being collected through any other data collection effort. The requested CN and FD data are unique to the COVID-19 public health emergency and are not being collected through any other data collection effort.

#### **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, or entities considered State Agencies, such as Indian Tribal Organizations (ITOs), administer the FNS programs at the State level and collect the necessary data to ensure correct eligibility determinations and



delivery of benefit. The State agencies are not considered small entities.

Similarly, Local WIC Agencies are government agencies at the local level and are not considered small businesses or 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.**

This is a one-time data collection that is required under statutes arising from the COVID-19 pandemic. States can elect whether or not to apply for a waiver. If they apply for a waiver, they will be required to submit evaluation information required by FFRCA. If States use commodities during this time, they will be required to report on FNS292A. FNS has limited the collection of information to the minimum amount required to comply with the intent of standards set forth in the pandemic response. Were FNS not to collect the data associated with FFCRA requirements and other pandemic response, FNS would not be able to issue waivers, collect information for pandemic response-related funding, report to Congress, and provide monitoring and tracking of the pandemic response.

**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;**  
FNS is requesting that State agencies report the USDA commodities used during a disaster on a weekly basis, using form FNS-292A Report of Commodity Distribution for Disaster Relief (approved under OMB Control Number 0584-0594). FNS requires this information on a weekly basis in order for FNS Food Distribution (FD) staff to monitor levels of USDA commodities more frequently to ensure that States have access to USDA commodities in the coming weeks.
- **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 reporting of evaluation data 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 and publishing a 60-Day Federal Register notice.

**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.**

The Department complies with the Privacy Act of 1974. No confidential information is associated with this collection of information and no such assurances of confidentiality are provided. This ICR does not

request any personally identifiable information nor does it contain any forms that require a Privacy Act Statement.

**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.**

As shown in Attachment A, FNS anticipates two types of respondents: State Government workers and Local Government workers at WIC agencies. Together, their reporting burden is 6,996 burden hours. Note that the estimates below assume data collection over six months, though they will be revised should the Public Health Crisis timeline differ.

SNAP State Program Staff will have two types of burden:

- Waivers: FNS anticipates up to 25 waivers opportunities under the Public Health Emergency, of which each state will request about 5 waivers. SNAP Program Staff in 53 State Agencies will submit approximately 5 waiver requests. Each waiver will take about 15 minutes to complete for a total of 66.25 burden hours. (53 State Agency Staff \* 5 waivers = 265 responses \* .25 hours = 66.25 burden hours)
- Evaluation Information: SNAP Program Staff in 53 State Agencies will submit 1 State Plan each, reporting on the evaluation data required by FFRCA. It will take them about 3 hours to report the data in the State Plan for a total of 159 burden hours. (53 State Agency Staff \* 1 State Plan = 53 responses \* 3 hours = 159 burden hours)

WIC State Program Staff will have two types of burden:

- Waivers: FNS anticipates up to 40 waiver opportunities under the Public Health Emergency. Each state will request about 10 waivers. WIC Program Staff in 89 State Agencies will submit approximately 10 waiver requests. Each waiver request will take about 15 minutes to complete for a total of 222.5 burden hours. (89 State Agency Staff \* 10 waivers = 890 responses \* .25 hours = 222.5 burden hours)

- Evaluation Information: WIC Program Staff in 89 State Agencies will submit 1 State Plan, reporting on the evaluation data required by the FFRCA. It will take them about 3 hours to complete the report, for a total of 267 burden hours. (89 State Agency Staff \* 1 State Plan = 89 Responses \* 3 hours = 267 burden hours)

FMNP State Program Staff will have two types of burden:

- Waivers: FNS anticipates up to 8 waiver opportunities under the Public Health Emergency and each state will request 4 waivers. FMNP Program Staff in 49 State Agencies will submit approximately 4 waiver requests. Each waiver request will take about 15 minutes to complete for a total of 49 burden hours. (49 State Agency Staff \* 4 waivers = 196 responses \* .25 hours = 49 burden hours)
- Evaluation Information: FMNP Program Staff in 49 State Agencies will submit 1 State Plan, reporting on the evaluation data required by the FFRCA. It will take them about 3 hours to complete the report, for a total of 147 burden hours. (49 State Agency Staff \* 1 State Plan = 49 Responses \* 3 hours = 147 burden hours)

CN State Program Staff will submit data on three types of existing FNS Forms:

- FNS10: CN Program staff in 53 States will submit information on an existing FNS form in the remarks section. They will enter the data monthly for six months, or until the Public Health Emergency is finished. It will take about 15 minutes to complete for a total of 79.5 burden hours. (53 State Agency Staff \* 6 submissions = 318 responses \* .25 hours = 79.5 burden hours)
- FNS44: CN Program staff in 53 States will submit information on an existing FNS form in the remarks section. They will enter the data monthly for six months, or until the Public Health Emergency is finished. It will take about 15 minutes to complete for a total of 79.5 burden hours. (53 State Agency Staff \* 6 submissions = 318 responses \* .25 hours = 79.5 burden hours).
- FNS418: CN Program staff in 53 States will submit information on an existing FNS form in the remarks section. They will enter the data monthly for six months, or until the Public Health Emergency is finished. It will take about 15 minutes to complete for a total of 79.5 burden hours. (53 State Agency Staff \* 6 submissions = 318 responses \* .25 hours = 79.5 burden hours).

Food Distribution State program Staff will have one type of burden:

- FNS292A: Food Distribution Program Staff in 65 State Agencies will submit form FNS292A 26 times (weekly over six months, or until the Public Health Emergency is finished. This is an increase in burden for an existing, approved form. It will take them approximately 15 minutes to complete the form each time for a total of 422.5 burden hours. (65 State Agency Staff \* 26 submissions = 1,690 responses \* .25 hours = 422.5 burden hours).

Local Government Agency Staff: Reporting requirements in FFRCA will require Local Government staff at Local WIC Agencies to report evaluation data to State Agencies so they can report it to FNS.

- Report to State: Local Agency staff in 1,808 Local WIC agencies will submit 1 report to the WIC State Agency. It will take 3 hours to complete and submit the report for a total of 5,424 burden hours (1,808 Local Agency staff \* 1 submission = 1,808 responses \* 3 hours = 5,424 burden hours)

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

The information collection burden falls on two categories of government employees: State program staff and, for the WIC waivers, program staff who work for Local WIC Agencies. 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 2019, using the corresponding occupation code 11-9151, Social and Community Services Managers(<https://www.bls.gov/oes/current/oes119151.htm>). According to the most recent BLS data, workers in this occupation earn a median wage rate of \$35.05 per hour. States would incur an annualized administrative cost of \$35.05 per hour burden in the information collection.

For SNAP, fifty percent of administrative costs incurred by State agencies are reimbursed by FNS. Half of the \$35.05 per hour wage rate is \$17.53 per burden hour.

As shown in Appendix A, the initial cost State and Local costs are \$241,254.66. In order to account for fringe benefits (fully-loaded wage rates), an additional 33% of the initial cost ( $\$241,254.66 \times .33 = \$79,614.04$ ). has been added. With the fully-loaded rate, the total annual respondent cost is \$320,868.70 ( $\$241,254.66 + \$79,614.04 = \$320,868.70$ )

#### **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.**

As shown in the bottom (Federal Section) of the Burden Table in Appendix A, the initial Federal cost is **\$69,506.61**. To account for fringe benefits (fully-loaded wages), an additional 33% of the initial cost has been added ( $\$69,506.61 \times .33 = \$22,937.18$ ). With the fully-loaded rate, the total Federal annualized cost is \$92,443.79 ( $\$69,506.61 + \$22,937.18 = \$92,443.79$ ). This comes from four categories of costs, all of which assume a GS13, step 1 Federal worker in the Washington, DC area examines the information. Current federal hourly wage rates for the Washington, DC area, based on OPM information is \$49.19 per hour (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](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx))).

- **SNAP Administrative Cost Sharing: (\$3,948.63)** As noted above, fifty percent of the administrative costs incurred by SNAP State agencies are reimbursed by FNS. The two SNAP State Program Staff lines total ( $\$1,161.36 + \$2,787.27 = \$3,948.63$ ).

- Waiver Request Reviews: **(\$16,613.92)** As shown in Attachment A, FNS anticipates 1,351 waiver requests across the programs (265 SNAP + 890 WIC + 196 FMNP = 1,351). A GS13 Step 1 Federal Worker hourly wage rate is \$49.19. It will take approximately 15 minutes to review each waiver request, for a total of \$16,613.92)
- Evaluation Info: **(\$28,161.28)** FNS anticipates 1,145 responses of required FFRCA Evaluation Information in State Plans and on forms FNS10, FNS44, and FNS418. It will take a GS13, Step 1 federal worker about 30 minutes to review the data. (1,145 \* .5 hours \* \$49.19/hour = \$28,161.28).
- Review FNS292A: **(\$20,782.78)** FNS anticipates 1,690 responses to the FNS292A for federal workers to review. It will take about 15 minutes to review the information. (1,690 responses \* .25 hours \* 49.19/hour = \$20,782.78).

#### **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 request has multiple components.

- This is *a new OMB information collection request* for burden over the existing burden approvals as described in A2. This new information collection request is the result of program changes and will add 6,996 burden hours and 5,994 responses to OMB's inventory.
- A request to collect evaluation data required by FFRCA via State Plans,
- A request to collect additional information on CN Forms FNS10; FNS44, and FNS 418
- A request to collection data more frequently than already approved for FNS292A.

#### **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.**

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."**

FNS does not have any exceptions to the certification statement.