



Food and Nutrition  
Service

1320 Braddock Place  
Alexandria, VA  
22314

**MEMORANDUM**

**TO:** James Crowe  
Desk Officer  
Office of Information and Regulatory Affairs, OMB

**THROUGH:**  
Melissa Abelev  
Assistant Deputy Administrator  
  
Ruth Brown  
Office of the Chief Information Officer, United States Department of Agriculture

**FROM:**  
Pamilyn Miller  
Administrator

**RE: Emergency Approval of New Information Collection for Implementation of the Families First Coronavirus Response Act of 2020**

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting emergency approval under the Paperwork Reduction Act (PRA) to collect information associated with implementation of the Families First Coronavirus Response Act of 2020. The Families First Coronavirus Response Act of 2020, enacted on March 18, 2020, authorizes the Secretary of Agriculture to approve a number of program adjustments while requiring evaluation data from states that elect to use the adjustments via program waivers.

OMB has established regulations for the emergency processing of information collection requests (ICR) at 5 CFR 1320.13<sup>[1]</sup>. OMB can authorize Emergency Clearance for an information collection, for up to 6 months.

The Food and Nutrition Service is requesting emergency Clearance for an information collection related to the COVID-19 Public Health Emergency and information needed to help distribution nutrition assistance and meet reporting requirements set forth in the Families First Coronavirus Response Act and related activities. FNS can attest that the collection of information is:

- Needed sooner than OMB clearance can be granted under normal procedures;
- Essential to the mission of the agency; and

The agency cannot reasonably comply with normal clearance procedures because:

- Public harm is reasonably likely to result if normal clearance procedures are followed;
- An unanticipated event has occurred; and

---

<sup>[1]</sup> 5 CFR 1320.13(f) states that OMB will issue clearance for a maximum of 90 days. However, this provision was revised by P.L. 104-106, Sec. 5605, in 1996. The revision increased the maximum clearance to 180 days or 6 months.

- The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court ordered deadline to be missed.

The nutrition assistance is needed immediately due to the Public Health Emergency. Waiting for the normal clearance process to take place would put emergency nutrition assistance at risk for millions of Americans needing the assistance.

---

Program Area Senior Executive or Representative

---

Pamilyn Miller, Administrator