

**SUPPORTING STATEMENT for**

**OMB Control Number 0584-0037:**

**Report Of Commodity Distribution For Disaster Relief (FNS-292A) And Report Of  
Disaster Supplemental Nutrition Assistance Program Benefit Issuance (FNS-292B)**

**Recordkeeping Burden Only**

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Appendix H1: Food Programs Reporting System (FPRS) Screen Capture - FNS-292A

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Appendix H3: Food Programs Reporting System (FPRS) Screen Capture – Public Burden Statement w/OMB Control # and Expiration Date

Appendix I: Burden Table

**A1. Circumstances that make the collection of information necessary.**

**Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This is a revision of a currently approved collection. Under Section 32 of the Act of August 24, 1935 (7 U.S.C. 612c), as amended; Section 416 of the Food and Agriculture Act of 1949 (7 U.S.C. 1431), as amended; Section 709 of the Food and Agriculture Act of 1965 (7 U.S.C. 1446a-1), as amended; Section 4(a) of the Agriculture and Consumer Protection Act of 1973 (7 U.S.C. 612c note), as amended; and by Sections 412 and 413 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5179, 5180), State distributing agencies may release commodity or donated foods procured by the United States 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), a State distributing agency, including an Indian Tribal Organization (ITO) administering FNS programs, must submit its final FNS-292A to FNS within 45 days of terminating disaster operations, and under 7 CFR 250.19 (a)(b), must maintain a record of this form for three years.

The Disaster Supplemental Nutrition Assistance Program (D-SNAP) is a separate program from the Supplemental Nutrition Assistance Program (SNAP) and is authorized by Section 412 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) and Section 5(h)(1) of the Food and Nutrition Act of 2008. State agencies may operate a D-SNAP to address the temporary food needs of applicants in an affected area of a State that has received a Presidential declaration of Major Disaster with Individual Assistance. According to FNS's

D-SNAP Guidance handbook, a State agency must submit its final FNS-292B to FNS within 45 days of terminating D-SNAP operations, and under 7 CFR 250.19 272.1(f), must maintain a record of this form for three years.

## **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 an ongoing information collection which only pertains to the recordkeeping burden associated with forms FNS-292A, *Report of Commodity Distribution for Disaster Relief*, and FNS-292B, *Report of Disaster Supplemental Nutrition Assistance Benefit Issuance*. The reporting burden associated with these forms is approved under OMB No. 0584-0594 (Food Program Reporting System; expiration date: 07/31/2023).

Form FNS-292A, *Report of Commodity Distribution for Disaster Relief*, is used by State distributing agencies and ITOs administering the Food Distribution Program on Indian Reservations (FDPIR). State distributing agencies and ITOs use this form to provide a summary report to FNS following termination of disaster commodity assistance and to request replacement of donated foods distributed during the disaster or situation of distress. State distributing agencies and ITOS must provide this form to FNS within 45 days following termination of the disaster assistance, and maintain records of this form for three years.

Form FNS-292B, *Report of Disaster Supplemental Nutrition Assistance Benefit Issuance*, is used by State agencies that administer D-SNAP. This form is used by State agencies to report to FNS

the number of households and persons certified for Disaster Supplemental Nutrition Assistance Program (D-SNAP) benefits as well as the value of benefits issued. If approved to operate D-SNAP by FNS, a State agency must submit this form to FNS within 45 days of terminating D-SNAP operations, and maintain records of this form for three years.

### **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 accordance with the E-Government Act of 2002 (E-Gov), FNS has reviewed the process for collecting information via Form 292-A and 292-B and will provide electronic submission of these forms with an alternative for paper submission, if needed.

Agencies will collect information using an electronic version of form FNS 292-A and FNS 292-B that can be submitted using the Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov> (FPRS Form images are included in Appendix H1-H3). All State SNAP agencies and State distributing agencies have the technological capacity to support electronic submissions. State SNAP agencies and State distributing agencies that administer FNS nutrition assistance programs will provide the information which is collected only once a form of FNS disaster relief is implemented. Although the time per has increased for recordkeeping, the frequency of collection and the recordkeeping procedures have not changed since the previous collection was approved. Although records of these forms are maintained electronically in FPRS, State SNAP agencies and State distributing must also maintain records of these forms for three-

years.

**A4. Efforts to identify duplication.**

**Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

There is no similar information available. The information required for forms FNS-292-A and FNS 292-B is not currently maintained in any other entity outside of FNS. 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.

**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.**

Although smaller State SNAP agencies and State distributing are involved in this data collection effort, they deliver the same program benefits and perform the same function as similar entities. Thus, they maintain the same kinds of information on file. There are no small entities associated with this information 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 for State SNAP agencies and State distributing agencies that offer temporary nutrition assistance following a disaster. The recordkeeping of this data is done only after a disaster situation has occurred and these records are maintained by State SNAP Agencies and State distributing agencies, respectively. However, if information collection was not collected in the period following each disaster program, FNS would be unable to monitor the issuance of D-SNAP benefits and the distribution of surplus foods during disaster situations, ensure integrity and reimburse States appropriately for their disaster relief efforts. In addition, FNS would be unable to respond to White House, Congressional, and outside requests to accurately quantify disaster relief provided by FNS.

#### **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. 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.**

A 60-day notice was published in the Federal Register (FR) on December 1, 2020 (85 FR 77140). The public comment period ended on February 1, 2021. No comments were received.

In December 2020 and January 2021, FNS conducted limited consultations with State agency contacts familiar with SNAP Forms activities to better inform burden estimates contained in this ICR. The individuals/organizations consulted about the information collection are listed in the table below.

Contact	Organization	Email
Heather Miles	Oregon Department of Human	Heather.j.miles@dhsosha.state.or.us

Contact	Organization	Email
	Services	
Jaclyn Cantu	Texas Department of Agriculture	<a href="mailto:Jaclyn.Cantu@TexasAgriculture.gov">Jaclyn.Cantu@TexasAgriculture.gov</a>
Lisa Cowell	Tennessee Department of Human Services	Lisa.Cowell@tn.gov

FNS reached out to 6 States for consultants on this information collection (3 SNAP State agencies and 3 State distributing agencies), but only 3 consultants responded. The consultant for Texas agreed with FNS’ estimate of 5 minutes for the FNS-292A. The consultant for Oregon is responsible for both the D-SNAP and disaster household distribution programs in Oregon, and gave an estimate of 10 minutes for both the FNS-292A and FNS-292B. The consultant for Tennessee did not provide feedback germane to this consultation. Based on feedback provided by the State agency representatives contacted as part of the consultation process, FNS increased the number of hours needed to create and maintain a record of the FNS-292A from 5 minutes (0.0835 hours) to 7.5 minutes (0.125 hours), and increased the number of hours needed to create and maintain a record of the FNS-292B from 5 minutes (0.0835 hours) to 7.5 minutes (0.125 hours). The burden estimates presented in Section A12 of this document incorporate changes made to hourly burden estimates as a result of these consultations.

**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 will be provided 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.**

The information requested from respondents on forms FNS-292-A and FNS-292-B contains no personally identifiable information (PII) aside from basic contact information including approval signature and title. Further, since PII is not collected for inclusion in records that are then retrieved routinely by that minimal PII, the forms are not subject to requirements of the Privacy Act of 1974, as amended. Therefore no assurance of confidentiality or privacy is provided. This information collection was reviewed in February 11, 2021 by Miguel Marling, FNS Privacy Act 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.**

This information collection contains no questions of a sensitive nature.

**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.**

**Reporting Burden:**

There is no additional reporting burden associated with this information collection. The reporting burden associated with these forms is approved under OMB No. 0584-0594 (Food Program Reporting System; expiration date: 7/31/2023).

**Record Keeping Burden:**

The total annual number of respondents for this data collection is 108 recordkeepers annually. The detailed, estimated recordkeeping burdens for this collection, including the number of respondents, frequency of response, average time to respond, and estimated hours, are detailed in “Appendix I: Burden Table”

While the number of disasters that occur annually is not predictable, FNS estimates that 55 State food-distributing agencies will maintain records of a FNS-292A annually, and that a maximum of 53 State SNAP agencies will maintain records for FNS-292B annually, for 108 records annually. The time needed to maintain each record is 7.5 minutes (0.125 hours). The total burden to maintain these records annually is 13.5 hours rounded up to 14 hours (108 records maintained annually x 0.125 hours). This burden estimate represents an increase of 4.5 hours from the previous submission for this activity. The increase is a result of updating the estimated hours per response from 5 minutes (0.0835 hours) to 7.5 minutes (0.125 hours) based on information received from State agency representatives during the consultation process.

Burden Table:

Respondent Category	Type of respondents (optional)	CFR Citation	Form/Instrument	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate (Fully-loaded)	Federal Share of Administrative Expenses	Total Annualized Cost of Respondent Burden
State Government	Food Distribution State Agency Staff	7 CFR 250.19 (a)(b)	Commodity Distribution FNS-292A	55	1	55	0.125	6.875	\$ 46.61	0%	\$ 320.44
State Government	SNAP State Agency Staff	7 CFR 272.1(f)	D-SNAP Benefit Issuance Form FNS 292-B	53	1	53	0.125	6.625	\$ 46.61	50%	\$ 154.40
	<b>TOTAL</b>			<b>108</b>	<b>1.000</b>	<b>108</b>	<b>0.1250</b>	<b>14</b>			<b>\$ 474.84</b>

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

Respondents and record keepers involved in this collection will be managers at State Departments of Social Services, which corresponds to the Bureau of Labor Statistics Category 11-9151, Social and Community Service Managers. Based on the most recent Occupational Employment and Wage Estimates from July 2019<sup>1</sup>, workers in this category employed by State Governments earn an hourly mean wage of \$35.05. FNS then adjusted each of these hourly wage rates to reflect total compensation, which includes non-wage factors such as overhead and fringe benefits (e.g., health and retirement benefits). To do this, we used an overhead and fringe benefits rate of 33 percent, and arrived at a “fully-loaded”: wage rate of \$46.61. Using the hourly wage rates adjusted to include fringe benefits (“fully-loaded”) and the total estimated hourly burden, FNS estimates that this information collection will result in an initial cost of \$240.97 for the respondents. The FNS-292A is estimated to cost \$320.44. The FNS-292B cost is estimated at \$154.40, which creates a total estimate cost of \$474.84

<sup>1</sup>[https://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](https://www.bls.gov/oes/current/oes_nat.htm#11-0000)

The estimated costs to maintain the FNS-292A – Report of Commodity Distribution for Disaster Relief is calculated by multiplying the burden hours (6.875) by the mean hourly wage rate adjusted to include fringe benefits of those handling the forms (\$46.61). This total came out to be \$320.44.

Estimated costs for the FNS-292B – Report of D-SNAP Benefit Issuance is calculated by multiplying the burden hours (6.625) by the mean hourly wage adjusted to include fringe benefits of those handling the forms (\$46.61). FNS then reduced this total by 50%, since FNS reimburses State agencies for 50% of the administrative costs incurred. This total came out to be \$154.40.

**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.**

Using the 2021 General Schedule for the Washington, DC area, FNS estimates the combined total annualized cost to the Federal Government is \$1,958.70 with fully loaded wages. This cost

includes: employee labor for analyzing, evaluating, and summarizing information from records in this collection (15 minutes per FNS 292-A x 55 annual responses = 13.75 hours) (15 minutes per FNS 292-B x 53 annual responses = 13.25 hours) by a FNS Program Specialist (GS-11, Step 1), as well as the cost associated with the preparation of this information collection package (6 hours) by a FNS Program Analyst (GS-13, Step 1) and review (2 hours) by a FNS Supervisory Program Analyst (GS-14, Step 1). The breakdown of this costs is identified below:

Activity	Hours	Hourly Wage Rate <sup>2</sup>	Cost
Review of 292-A (55 annual responses) (Program Specialist, GS-11/Step 1)	13.75	\$46.36 (34.86 x 1.33)	\$637.45
Review of 292-B (53 annual responses) (Program Specialist, GS-11/Step 1)	13.25	\$44.34 (34.86 x 1.33)	\$614.27
Preparation of information collection package (Program Analyst, GS-13, Step 1)	6	\$66.07 (\$49.68 x 1.33)	\$396.42
Review of information collection package (Supervisory Program Analyst, GS-14, Step 1)	2	\$78.08 (\$58.71 x 1.33)	\$156.16
Reimbursement cost from Federal to States			\$154.40
<b>Total</b>	<b>33</b>	-	<b>\$1,958.70</b>

**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.**

<sup>2</sup>[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/DCB_h.aspx)

This is a revision of a currently approved information collection request. The currently approved burden inventory for this data collection is 108 estimated total annual responses and 9 estimated total annual burden hours. FNS is requesting 108 total annual number of responses and 13.50 total annual burden hours rounded to 14 total annual burden hours. In this request, the estimated total annual number of responses remains the same; and, the estimated total annual burden hours has increase by 5 burden hours due to program changes. This change is based on feedback from stakeholders who indicated the agency needed to increase the time per to maintain each form from 5 minutes (0.835) to 7.5 minutes (0.125) which we determine is sufficient.

**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."**

There are no exceptions to the certification statement.