

**SUPPORTING STATEMENT for
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND
TRAINING PROGRAM ACTIVITY REPORT RECORDKEEPING AND REQUESTS
FOR ADDITIONAL 100 PERCENT FUNDING**

OMB No. 0584-0339

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ATTACHMENT A: Legal Authority

ATTACHMENT B: OMB #0584-0339 Burden Table

ATTACHMENT C: FNS–583 SNAP Employment and Training (E&T) Program Activity Report

ATTACHMENT D: FPRS Public Burden Statement, OMB# and Expiration Date for FPRS

ATTACHMENT E: FPRS Screenshot of the FNS 583

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 an extension, without change, of a currently approved collection for recordkeeping of the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program Activity Report (form FNS-583) and preparation of State requests for additional funding only.

The primary burden on the FNS 583 is cleared under OMB Control No.: 0584-0594, Expiration Date: 07/31/2023. In addition, the actual reporting burden to request for additional E&T funds is in no specific format and is emailed to the FNS Regional Office. The Employment and Training Program administered by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), plays an important role in ensuring as a condition of eligibility, that each non-exempt SNAP household member age 16 to 59 be work registered by the State agency at the time of application and once every twelve months thereafter in compliance of Section 6(d) of the Food and Nutrition Act of 2008 and SNAP regulations at 7 CFR 273.7.

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.

In accordance with Section 6(d) of the Act and 7 CFR 273.7(c)(9),(10), and (11), State agencies must maintain data that is submitted on quarterly reports about their E&T Programs so that the Department can monitor State performance.

In accordance with Section 16(h)(1)(C) of the Act and 7 CFR 273.7(d)(1)(i)(D), State agencies interested in additional 100 percent funding that exceeds the formula grant allocation must

submit requests to FNS in writing. Requests are submitted via email to the appropriate FNS Regional Office. FNS allocates funding to meet all or some of a State agency's request as it considers appropriate and equitable.

All data reported on the (FNS-583) by State agencies submit data using the electronic Food Programs Reporting System (FPRS), which is approved separately under OMB No. 0584-0594, expiration date 07/31/2023; we are not seeking any reporting burden for FNS 583 in this request. The data maintained helps FNS make supplemental funding decisions throughout the Federal fiscal year. FNS also uses to report on program activities for Congress and shares data with the members of the general public when requested.

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.

This information collection complies with the E-Government Act of 2002. There are no electronic submissions per OMB requirements, for the collection to request for additional funds or maintain this form FNS 583.

State agencies submit requests for additional funds via email to FNS Regional Offices at any time. There is no form required for these requests. Requests for additional funds are typically submitted on State agency letterhead with details about the nature of the request and the proposed use of additional funds.

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 are no similar data collection efforts. FNS solely monitors State E&T program performance to ensure integrity. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State agency administrative reporting requirements and special studies by other government and private agencies.

The information required for FNS-583 is currently reported and collected in FPRS under OMB Control No.: 0584-0594, Expiration Date 7/31/2023; therefore, FNS is only requesting recordkeeping burden for this activity for FNS 583 in order to avoid duplication.

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.

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Information being requested or required has been held to the minimum required for the intended use. Although smaller State agencies are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other State agency. 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.

If State agencies were not required to maintain records supporting FNS-583 submissions, FNS would not be able to adequately monitor and audit State data to verify that submissions are accurate and reflective of federally funded services. Moreover, State agency must keep records on the number of exemptions issued to able-bodied adults subject to a time limit and report this on the FNS-583. If FNS could not monitor State agencies' quarterly exemption data and verify these records, FNS could not ensure program integrity and that exemptions do not exceed the number authorized.

If FNS could not maintain request for additional funding, it would be unable to ensure program integrity and make financial adjustments in accordance with the statute based on historical information.

FNS must monitor State agency E&T program performance to ensure that the Program is being efficiently and economically operated. If unable to maintain the data necessary to oversee program operations, FNS could not fulfill this mandate, nor could it initiate audits timely or recommend effective corrective measures to ensure successful State agency program operations.

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 cause this information collection to be conducted 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 August 14, 2020, FNS published the notice in the *Federal Register* (FR) Volume 85, Page 49621. No public comments were received via the Regulations.gov site, fax, U.S. Postal Service or via email.

The following individuals/organizations have been consulted about burden estimates associated with this data collection:

1) Kimberlin Donald, Georgia Division of Family & Children Services;

Kimberlin.donald@dhs.ga.gov

- 2) Willard Seedman, Connecticut Department of Social Services, Willard.seedman@ct.gov; and
3) Lisa MacLeod; Michigan Workforce Development, lisa.macleod@michigan.gov

No recommendations or suggestions were received from the individuals consulted.

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 will comply with the Privacy Act of 1974. No private information is associated with this information collection.

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 involved in this information collection.

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 burden for activities in this revision is 49.51 (rounded up to 50 total annual burden hours) and 248 responses. This collection includes only the reporting burden for additional funds requests submitted to FNS via email and recordkeeping burden for the FNS-583 instrument. Again, the reporting burden for the form FNS-583 is included in the approved FPRS burden (OMB No. 0584-0594, expiration date 07/31/2023.).

ESTIMATED ANNUAL REPORTING BURDEN HOURS

The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond and annual hour burden are shown in the attached Burden Table (Appendix X). A summary of the burden appears below.

- Requests for additional E&T funds: Under 7 CFR 273.7(d)(1)(i)(D) State agencies may request additional E&T funds if needed after initial allocations are made. FNS will reallocate available funds (e.g. funds that are unallocated or funds that are allocated but will not be spent) in a fair and equitable manner. FNS estimates that out of 53 State agencies approximately 18 State agencies per year request additional funds. FNS estimates it takes one hour for a State agency to prepare a request for additional funds.

Affected Public	Instrument	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. Total Hours Per Response	Est. Total Burden Hours
State Government	Preparing request for additional funds	18	1	18	1.00	18.00
Total		18	8	18	1.00	18.00

ESTIMATED TOTAL RECORDKEEPING BURDEN HOURS

- Retention and Custody of Records. Under 7 CFR 277.12 (1) and (2) All financial records, supporting documents, statistical records, negotiated contracts, and all other records pertinent to program funds shall be maintained for three years from the date of submission of the annual financial status report or if any litigation, claim, or audit is started before the expiration of the three-year period, the applicable records shall be retained until these have been resolved.

Affected Public	Instrument	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. Total Hours Per Response	Est. Total Burden Hours
State Government	Request for additional funds Recordkeeping	18	1	18	.137	2.47
State Government	FNS-583 Recordkeeping	53	4	212	.137	29.04
Total		53	4.340	230	.137	31.51

Summary:

	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. Total hours per Response	Est. Total Burden
Reporting	18	1	18	1.000	18.00
Recordkeeping	53	4.340	230	0.1370	31.51
Total	53	4.679	248	0.1996	49.51

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

We anticipate that the information collection requirements described in this submission will be performed by administrative type staff at the State agency level. According to the Bureau of

Labor and Statistics (<https://www.bls.gov/oes/current/oes436014.htm>), the mean hourly wage of State Office and Administrative Support Workers is \$18.84 per burden hour in May 2019. The base annual cost to States is \$932.77. Including 33% for fringe benefits in the amount of \$307.81, the fully loaded cost is estimated to be \$1,240.58. The total cost is subsequently reimbursed to State agencies through their 100 percent Federal E&T allocations.

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 or 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 cost to the Federal government for the FNS-583 information collection and fund request, including fringe benefits is \$2,863.85 (\$2,153.27 base annual cost plus \$710.58 annual fringe benefits using 33%.) FNS has calculated the costs as follows.

Using the 2021 GS Salary Table, we estimate it took 20 hours for a GS-13 (step 1) to prepare the 60-day Notice, and complete the ICR package, for a total of **\$1,326.01 including fringe benefits** (20 hours x \$49.85 an hour = \$997.00 plus 33% for fringe benefits of \$329.01).

Once the GS-13-1 completed the two documents, they were reviewed and cleared by appropriate FNS officials. We used a GS-14, step 1, as the average hourly salary for these reviewing officials. We estimate it took four reviewing officials 4 hours to clear the 60-day Notice and the ICR package for a total of **\$1,253.39 including fringe benefits** (4 hours x \$58.90 an hour x 4 staff = \$942.40 plus 33% for fringe benefits of \$310.99).

We estimate that it takes 1 hour for a GS-13, step 1, to prepare the electronic file and submit to the agency webmaster, a GS 14, step 1, who converts to the file to an Internet friendly format and posts the form to the Internet. Total cost is **\$144.64 including fringe benefits** (((\$49.85 an hour x 1 = \$49.85) + (\$58.90 an hour x 1 = \$58.90) = \$49.85 + \$58.90 = \$108.75 plus 33% for fringe benefits of \$35.89).

State agencies submit requests for additional funds via email to FNS Regional Offices at any time. There is no form required for these requests. Requests for additional funds are typically submitted on State agency letterhead with details about the nature of the request and the proposed use of additional funds. FNS Regional Staff forward the submitted requests to the National Office for review and approval. We estimate that it takes .167 minutes for a GS-11, step 1, to transmit the requests to National Office. Total cost is **\$139.81 including fringe benefits** (\$34.97/hour X .167/minutes x 18 requests = 105.12 plus 33% for fringe benefits of \$34.69.)

The cost to the Federal government includes the annual costs to State agencies for the record keeping and preparation of requests for additional funds, as State agency costs are ultimately

reimbursements with federal funds at 100 percent or at 50 percent, based on how the State uses its federal funds for SNAP E&T.

Therefore, the total cost to the Federal government is: \$4,104.43 (\$2,153.27 in base salary costs + 710.58 fringe benefit cost +\$1,240.58 in State reimbursements).

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 an extension, without change, for a currently approved data collection. The current burden inventory is 49.51 rounded to 50 total annual burden hours and 248 total annual responses. There are no changes to the information collection since the last OMB approval.

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 for tabulation and publication of this information collection.

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 plans to display the OMB approval number and the expiration date on this information collection.

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."

The agency is able to certify compliance with all provisions under Item 19 of form OMB-83-1.