

Supporting Statement for
“The FNS User Access Request Form Data Collection”
(OMB Control Number 0584-0532)

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APPENDICES:

- **Appendix A: Legal Authority Public Law 107-347**
- **Appendix B: USDA Information System Security Program Directive**
- **Appendix C: OMB Circular No A-130**
- **Appendix D: FNS-674**
- **Appendix E: User Guide for Completing the 674**
- **Appendix F: Outside Consultations Comments on Form FNS-674**
 - Appendix F1: Outside Consultation Comment - Jessica Dinterman
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 - Appendix F4: Response to Jessica Dinterman
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- **Appendix G: Burden Calculations Table**

A. Justification

- 1. Explain the 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 of a currently approved collection. The Federal Information Security Modernization Act of 2014 (P.L. 113-283) and Office of Management and Budget (OMB) Circular A-130, *Managing Information as a Strategic Resource*, establish a minimum set of controls to be included in Federal automated information security programs. Establishing controls over the provisioning of access to sensitive systems and data is directed in OMB Circular A-130. The FNS User Access Request Form, FNS-674 (see Appendix D), is designed for this purpose and can be used in situations where (1) access to the FNCS network or an FNCS information system is required; (2) current access is required to be modified; and (3) access is no longer required and must be revoked.

- 2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.**

FNCS employees, contractors, State Agencies and partners (Food Banks, etc.) have requested access to FNCS systems via the User Access Request form. FNCS has used the information collected to grant access to the FNCS network and information systems. Information that is collected includes: Name, e-Authentication ID (if applicable), telephone number, email address,

contract expiration date, temporary employee expiration date, office address, State/locality codes, system name, form type, type of access, action requested, comments and special instructions.

From whom will the information be collected?

The User Access Request Form collects information from:

- new FNCS Employees
- new FNCS Contract Staff
- new State Agencies to FNCS
- new Partners to FNCS or
- Existing employees, Contract Staff, State Agencies or Partners to FNCS requesting updates to current access to FNCS information systems.

How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the internet)?

The information is collected via an electronically fillable form FNS-674 available online. The form must also be printed in a paper version to be signed by state users, to be scanned and submitted. After email submission to FNS contacts, forms usually remain electronic rather than requiring printing.

How frequently will the information be collected?

The information is requested as often as needed, based on the user requests for new access or updated access requests to systems. In State Agencies, the State Coordinators provide a liaison between the State Agency and the Information Systems Security Officers (ISSO) in FNCS Regional Offices and the Information Security Office (ISO) in the FNCS National Office.

Will the information be shared with any other organizations inside or outside USDA or the government?

This information will be stored in:

- The ISO records, where the information is stored and maintained for users requesting access to FNCS internal systems;
- The Financial Management Division (FMD) records, where the information is stored and maintained for users requesting access to Financial Management (FM) systems;
- The National Finance Center (NFC) records, where the information is stored and maintained for users requesting access to NFC systems; and
- The Digital Infrastructure Services Center (DISC) records, where the information is stored and maintained for users requesting access to DISC systems.

If this is an ongoing collection, how have the collection requirements changed over time?

The information collected on this form has changed to remove the system drop-down list and use a text box for single line of text entries instead. The form signatories have changed to remove the ISO signature box, and rename 'Authorizing Official' to 'Account Manager' to further align with USDA Departmental Regulation 3505-003. The instructions have changed to refer users to contact system websites and helpdesks for additional information on system-specific access control procedures. Also, the Rules of Behavior have been significantly updated to distinguish between internal and external users.

- 3. 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.**

FNCS has reached out to the FNCS workgroup to collect requirements in order to automate the FNS- 674 for applications that have available funding to support the automation. Therefore, this collection is in compliance with E-Government 2002. Automation cannot be implemented at this time. Information on the FNS-674 is displayed and captured using Microsoft ASP.Net and HTML, via a web-based system on the FNCS web site. The information is stored in Microsoft SharePoint Server. The information is transmitted over a secured HTTP protocol. The foundation of this technical architecture is Microsoft, which is consistent with current FNCS standards. The FNS-674 forms are currently submitted via email and sent to the respective system Account Manager for record-keeping. The form is a fillable electronic Adobe pdf, available on the FNCS intranet e-forms library [here](#) and also on the internet on various public sites for systems. FNCS information system Account Managers are responsible for maintaining approved copies of the form, if used for their respective information systems. Currently, FNCS does not have an electronic submission web-based system to receive these requests and no plans are in place for one in the near future.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There is no similar information available. FNCS solely monitors issuance of FNCS network access to ensure integrity. The information required for FNS-674 is not currently reported to any other entity outside of FNCS. Every effort has been made to avoid duplication. FNCS has reviewed USDA reporting requirements.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There will be no impact to small businesses or entities that work with FNCS. FNCS anticipates that out of the 180 respondents, 75 percent, or 130, are considered respondents of small businesses.

6. Describe the consequences 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 mandatory and on-going data collection required for access by external personnel to FNCS information systems. If this form were not submitted, FNCS could not ensure integrity of access to FNCS information systems. Users provide name, e-Authentication ID (if exists), telephone number, email address, contract expiration date, temporary employee expiration date, office address, State/locality codes, system name, type of access, action requested, comments and special instructions to gain initial access to FNCS information systems and may require subsequent submissions if access requires changes. This form can also be used if an individual should be removed as a user from a specific system.

7. 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.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.**

A 60-day notice requesting public comment on this collection was published in the Federal Register at Vol. 85, No. 95, Page 29393, Friday, May 15, 2020. The comment period closed on July 14, 2020. No comments were received.

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 record keeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

An employee working group considered all suggestions received when redesigning this form for its users. We reached out to three individuals for outside consultations. Their input was requested about the FNS-674, including specifically on the burden estimate and other characteristics including availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

The outside consultations included three (3) State Users of the FNS-674, including Bethany Caputo (401-415-8432), Kirstin Meloro (302-255-9097), and Jessica Dinterman (1-800-332-6347 x.3373) as shown in Appendices F1-F6. Bethany Caputo, SNAP Administrator, RI Department of Human Services, RI, Bethany.caputo@dhs.ri.gov, suggested that it would be helpful if electronic signatures could be used. However, this comment was determined to be not applicable, as digital

signatures may not be used by State Users at this time due to the limitation that PIV-card digital signatures are considered the only valid form of digital signature. Kirstin Meloro, Program Compliance Manager, DHSS-Division of Management Services – Quality Control Unit, DE, kirstin.meloro@delaware.gov, proposed the use of drop-down boxes, wherever possible, to make the form more user-friendly, and to include descriptions of acceptable user roles if user roles were to be selected from a drop-down list. The employee working group decided to reject this proposed change, considering that the information systems that employ this form for access control have a variety of system-specific user roles. Instead, the employee working group decided to alter the form instructions to direct users to the respective system’s website or helpdesk for additional guidance on how to complete the form for access to specific systems. Jessica Dinterman, Family Investment Supervisor, Carroll County Department of Social Services, MD, jessica.dinterman@maryland.gov, expressed an issue with confusion over what to enter in the Type of Access/Role form field as well, and suggested providing additional instructions to users. In response, the employee working group decided to update the form instructions to direct users to contact the respective system’s website or helpdesk for additional access control guidance. This update has been incorporated into the version of the FNS-674 to be used after OMB has approved.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

Payments or gifts are not provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The FNS-674 will contain a Privacy Act Statement and the data will be stored in accordance with the Federal Information Security Modernization Act of 2014 (P.L. 113-283) and OMB Circular A-130, *Managing Information as a Strategic Resource*. Access to records is limited to those persons who process the records for the specific uses stated in the Privacy Act notice. Any printed records are kept in physically secured rooms and/or cabinets. Various methods of computer security limit access to records. The System of Records Notice for this information collection is under development in the USDA Office of the Chief Information Officer.

11. 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 includes no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

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

Estimate of Burden

The respondents are State Agencies, who are located in the 50 states and Trust Territories, staff contractors and Federal employees. Respondents who require access to the FNCS systems are estimated at 3,600 annually (includes Federal, State and private) however, only 2,700 will account for the total public burden, excluding Federal employees. FNCS estimates that it will receive an average of 300 requests per month (15 per day). Of the 300, 70 percent (or 210) of the responses are State Agency users, 5 percent (or 15) are staff contractors and 25 percent (or 75) are Federal employees which is not included in the total number of responses. Annually, that results in 2,700 respondents (210 State Agency users per month + 15 staff contractors per month × 12 months).

REPORTING BURDEN

Affected Public	Form Number	Number of Respondents	Number of responses annually per Respondent	Total Annual Responses	Estimate of Burden Hours per response	Total Annual Burden Hours
Contractors	FNS-674	180	1	180	0.16667 (10 minutes)	30
State Agency Users	FNS-674	2,520	2	5,040	0.16667 (10 minutes)	840
Annualized Totals		2,700	1.9	5,220	10 minutes	870

RECORDKEEPING BURDEN

There is no recordkeeping burden imposed on the public. All requests from respondents are archived in FNCS systems.

Annualized Cost to Respondent

It is estimated that each respondent takes 10 minutes to read the instruction and complete the on-line form. The data provided in the table below is calculated using the hourly wage rate reported in the National Sector NAICS Industry-Specific estimates of US Occupational Employment and Wages in the U.S., May 2020; Department of Labor, Bureau of Labor Statistics at http://www.bls.gov/oes/current/oes_stru.htm. Occupational codes (OC) used for States and Contractors include NAICS 999200 - 13-0000 Business and Financial Operations Occupations (at \$38.79 hourly wage rate) and 15-1212 Information Security Analysts (at \$51.72 hourly wage rate).

Affected Public	Type of Instrument	Average time per response	Number of Respondents	Frequency of Response	Hourly Wage Rate	Cost to Respondent
State Agencies	FNS-674	0.16667	2,520	2	\$38.79	\$32,584.25
Contractors	FNS-674	0.16667	180	1	\$51.72	\$1,551.63
Total			2,700	3		\$34,135.88

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 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/startups or ongoing/annualized maintenance costs to the respondents.

14. Provide estimates of annualized cost to the Federal Government. Also, 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.

Description of Activities	HQ Staff (2 – GS-13 @ (\$49.19 per hour)	Regional Staff (14 – GS-12 @ \$36.76 per hour)	Contractor (\$51.72 per hour)	Total +33%
Updating on-line form to support the collection	2 hours = \$98.38			\$130.85
Testing of computer system			10 hours = \$517.20	\$687.88
Reviewing, approving and issuing password ¹	36 hours =\$1,770.84	108 hours = \$3,970.08		\$6,838.49
Labor for analyzing, evaluating, summarizing, and reporting on the collected information ²	16 hours =\$787.04			\$1,046.76
Total Cost to the Federal Government³				\$8,703.98

National Office: Two (2) GS-13 Information Security Officers spend 2 minutes (0.04 of an hour) reviewing, approving, and issuing passwords for each of the National Office applications received. (3,600 applications/25% = 900 x 0.04 = 36 hours. 36 hours @\$49.19 per hour = \$1,770.84.)

Regions: Fourteen (14) GS-12 Information Security Officers spend 2 minutes (or 0.04 of an hour) reviewing, approving, and issuing passwords for users in State agencies. (3,600 applications/75% = 2,700 x 0.04 = 108 hours. 108 hours @ \$36.76 per hour = \$3,970.08)

² Two (2) GS-13 HQ Security Officers spend 2 hours per quarter, each, on the analyzing and running reports of security users and authorized systems. (16 hours @ \$49.19 per hour = \$787.04)

³ 33% fully loaded wages were added to calculations in order to provide a more accurate representation of total costs

Annualized costs are determined by tasks as described in the chart above. The FNCS National Office and Regional staff salary was determined by the January 2020 Salary and Wage tables available from the Office of Personnel Management (OPM). The staff contractors' salary was determined by using the national average available from the Department of Labor. 33% fully loaded wages were added to calculations in order to provide a more accurate representation of total costs.

15. 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 to a previously approved collection.

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- 16. For collection of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans for publication.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display the OMB control number and expiration date on this form.

- 18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”**

There are no exceptions to the certification statement.