

**State SNAP Agency  
NDNH Matching Program Performance Report**

**OMB Information Collection Request  
0970 - 0464**

**Supporting Statement Part A - Justification**

**November 2021**

Submitted By:  
Office of Child Support Enforcement  
Administration for Children and Families  
U.S. Department of Health and Human Services

## **1. Circumstances Making the Collection of Information Necessary**

Federal law mandates state agencies administering Supplemental Nutrition Assistance Programs (SNAP) to participate in a computerized matching program with the federal Office of Child Support Enforcement (OCSE). The computerized matching program compares each state SNAP agency's applicant and recipient information with employment information maintained in the National Directory of New Hires (NDNH). The outcomes of the computerized match provide each state SNAP agency with information that will help to establish or verify an individual's eligibility for SNAP benefits. Determining eligibility also helps each state agency reduce payment errors, identify duplicate participation, and maintain program integrity. To receive NDNH information, each state SNAP agency must enter into a computer matching agreement with OCSE and adhere to its terms and conditions, including providing OCSE with an annual performance outcomes report.

The legal authority for the information collection activities associated with the SNAP performance report is: 1) subsection 453 (j)(10) of the Social Security Act (42 U.S.C. § 653(j)(10)), which allows the Secretary of the U.S. Department of Health and Human Services to disclose information maintained in the NDNH to state agencies administering SNAP under the Nutrition Act of 2008, as amended by the Agriculture Act of 2014; and 2) the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988 (5 U.S.C. § 552a), which sets forth the terms and conditions of a computer matching program; and 3) the Government Performance and Results Modernization Act of 2010, (Pub. L. 111-352, § 4, 124 Stat. 3865, 3871-73 (2011)), which requires agencies to report program performance outcomes to the Office of Management and Budget (OMB) and for the reports to be available to the public.

This is a revision of a currently approved information collection. See A.15 for details.

## **2. Purpose and Use of the Information Collection**

OCSE uses the information collected in the annual performance outcomes reports to measure state SNAP agency cost savings that are attributable to the SNAP-NDNH computerized matching program.

OMB requires OCSE to report performance measurements demonstrating how the use of NDNH information supports OCSE's strategic mission, goals, and objectives. OCSE will fulfill the performance measurements reporting requirement by compiling the state agency outcomes into OCSE's periodic performance measurement report that is included in the U.S. Department of Health and Human Services report to OMB.

## **3. Use of Improved Information Technology and Burden Reduction**

The performance outcomes reporting tool for this information collection is a commonly used electronic, formatted spreadsheet that performs automated data calculations of inputted values.

OCSE sends the performance measurements reporting tool to the state SNAP agencies electronically; states populate and then submit the completed reporting tool to OCSE electronically. Using available technology and electronic processes eliminates manual calculation and computation errors, as well as eliminates costs required to submit the report by mail.

**4. Efforts to Identify Duplication and Use of Similar Information**

State SNAP agencies' performance outcomes, attributable from computerized comparisons with the NDNH, are unique and not available from other sources.

**5. Impact on Small Businesses or Other Small Entities**

There is no impact on small businesses or other small entities.

**6. Consequences of Collecting the Information Less Frequently**

OCSE requires state SNAP agencies to provide their performance outcomes report annually. Collecting the information less frequently would result in OCSE providing outdated cost-savings measurements and inaccurate periodic performance reports to OMB. Not collecting the information at all would also jeopardize OCSE's ability to comply with the federal requirement to provide OMB with the periodic performance reports.

**7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

Not applicable.

**8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), OCSE published a notice in the Federal Register at 86 FR 30608 on June 9, 2021. The notice announced OCSE's intention to seek OMB approval of a collection of information and to provide a 60-day comment period for the public to submit written comments about this information collection activity. OCSE did not receive comments.

**9. Explanation of Any Payment or Gift to Respondents**

Not applicable.

## 10. Assurance of Confidentiality Provided to Respondents

The information collected does not contain personally identifiable information.; therefore, there are no issues of confidentiality.

## 11. Justification for Sensitive Questions

Not applicable as OCSE does not collect sensitive information in the performance outcomes report.

## 12. Estimates of Annualized Burden Hours and Costs

The estimated hourly burden per response is based on feedback from a few SNAP agencies that informed OCSE of the average time it takes staff to populate the performance reporting tool.

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Child, Family, and School Social Worker [21-1021] and wage data from May 2020, which is \$23.28 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is \$46.56. The estimate of annualized cost to respondents by burden hour is \$46.56 times 43.99 hours or \$2,048.17.

[https://www.bls.gov/oes/2020/may/oes\\_nat.htm#21-0000](https://www.bls.gov/oes/2020/may/oes_nat.htm#21-0000)

### Annual Burden Estimates

13	Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Annual Burden Hours Per Response	Total Annual Burden Hours	Average Hourly Wage	Total Annual Cost
	SNAP Agency Matching Program Performance Reporting Tool and Instructions	53	1	0.83	43.99	\$46.56	\$2,048.17
	<b>Estimated Annual Burden Total:</b>				<b>43.99</b>	<b>Estimated Annual Cost Total:</b>	<b>\$2,048.17</b>

### Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no capital, start-up, or ongoing costs required of the respondent to populate the performance reporting tool because it is a pre-formatted and universally used desktop application that states submit electronically to OCSE.

## 14. Annualized Cost to the Federal Government

The cost to the federal government to administer the SNAP-NDNH computer matching program is included in the overall cost to the federal government to operate and maintain the NDNH (OMB # 0970-0166), which is estimated to be \$12.7 million. This cost includes the

system development and technical assistance contracting costs; and telecommunications, security, data quality, and software and hardware costs incurred by OCSE in association with the NDNH.

There are no other costs to the federal government for this information collection because the reporting tool is a universally used desktop application that states receive electronically.

#### **15. Explanation for Program Changes or Adjustments**

The performance reporting tool instructions underwent minor grammatical edits; however, these program changes do not affect the burden hour or costs.

A few state SNAP agencies provided OCSE with their hourly estimates to populate the SNAP Performance Reporting tool. Since the previous approval, many states automated their reporting process, thereby reducing the amount of time it takes to populate the form. As a result, OCSE adjusted the hourly estimates to reflect the decrease to the total burden hour, which is reflected in the Burden Estimate table under A.12.

The annualized cost to respondents increased from the previous approval. This adjustment is a result of an increase in the average hourly wage of state agency program staff, per the Bureau of Labor and Statistics National Compensation Survey, published since the previous approval.

#### **16. Plans for Tabulation and Publication and Project Time Schedule**

OCSE provides OMB with an annual performance report, which includes the compiled information collected from each state SNAP agency performance report.

#### **17. Reason(s) Display of OMB Expiration Date Is Inappropriate**

Not applicable.

#### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.