

SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-0654:
FNS Information Collection Needs due to COVID-19

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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 submission seeks OMB renewal of an existing data collection (OMB 0584-0654, exp. 11/30/20), originally approved as an emergency approval, for activities associated with State SNAP, WIC, Farmers Market Nutrition Program (FMNP), Food Distribution (FD), and Child Nutrition Programs (CN) waiver requests and reporting during COVID-19. In sum, there are three types of information collection FNS is seeking through this approval (Table 1):

- **Waiver Requests and Notification of using flexibilities.** As described below, states have numerous flexibilities through the Families First Coronavirus Response Act (FFCRA) and the Continuing Resolution that they can use to continue operations during the unusual circumstances of COVID-19. Depending on the flexibility, they either make a request to FNS or notify FNS that they will use the flexibility. ***This submission seeks burden associated with those requests and notices.***
- **Data Reporting required by FFCRA.** The FFCRA requires anyone using FFCRA-related flexibilities to report on their use within 12 and within 18 months of first use, depending on the flexibility. ***This submission seeks burden associated with reporting the data to FNS.***
- **Data Reporting needed to monitor levels of commodity use and availability.** FNS is using disaster authority to distribute USDA commodities to states. ***This submission seeks burden associated with reporting the data to FNS.***

As the Food and Nutrition Service (FNS) is responding to the COVID-19 Coronavirus pandemic, it is implementing a number of waivers and program adjustments to ensure Americans in need can access nutrition assistance during the crisis while maintaining recommended social distancing practices. Three pieces of legislation have detailed many of the program adjustments available to FNS. The Families First Coronavirus Response Act of 2020 ([PL 116-127](#)), the Coronavirus Aid, Relief, and Economic Security (CARES) Act ([PL 116-136](#)), and the Continuing Appropriations Act, 2021 and Other Extensions Act ([PL 116-159](#)) provided a number of program adjustments and additional funding. The programs' authorizing statutes also allow for some waivers and flexibilities. The statutes describing these waivers and flexibilities also have reporting requirements. The Department is seeking renewal of this Information Collection Request in order to meet the information collection and reporting requirements detailed in the Families First Coronavirus Response Act of 2020, as well as program administration needs to implement the CARES Act of 2020 and adjustments in the Continuing Resolution.

Section 2302(a)(2) of the Families First Coronavirus Response Act of 2020 (FFCRA), enacted March 18, 2020, allows the Department of Agriculture to adjust, at the request of State agencies or by guidance in consultation with one or more State agencies, issuance methods and application and reporting requirements under the Food and Nutrition Act of 2008, as amended, (FNA) to be consistent with what is practicable under actual conditions in affected areas. Section 2302(c) of FFCRA requires the Secretary of Agriculture to submit a report to Congress following the end of the public health emergency, including a description of the measures taken to address the food security needs of affected populations during the emergency, including any information or data supporting State agency requests.

The Continuing Appropriations Act, 2021 and Other Extensions Act was signed into law on October 1, 2020, and includes some opportunities for State agencies to take advantage of additional flexibilities for SNAP. Specifically, Section 4603(a)(1) extends a number of the SNAP flexibilities offered through the Families First Coronavirus Response Act (FFCRA) and permits State SNAP agencies to adopt certain options without FNS approval, instead requiring States to notify FNS of the option(s) they are taking within 5 days of implementation. Additionally, the continuing resolution provides a finite time period for each adjustment option. The options provided by the continuing resolution are as follows: extend certification periods for up to 6 months and adjust periodic report requirements for some or all households with periodic reports due on or before June 30, 2021; use periodic reporting procedures to satisfy recertification requirements for certification periods set to expire on or before December 31, 2021; and adjust or eliminate the interview for some or all households through June 30, 2021. State agencies must report to FNS the options selected, the categories of households affected by each option, and their durations. Section 4603(a)(2) also provides States with the option to waive quality control reviews through September 2021. FNS has developed an optional online form (Error: Reference source not found) by which States can inform the agency of their selections, but will accept notification in any written form (e.g. email or letter).

Further, Section 2203(a)(1) allows State agencies administering the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) to request a waiver of 17(d)(3)(C)(i) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(d)(3)(C)(i)), which requires applicants be physically present in the clinic. Local agencies are required to submit a report detailing the use and benefits of this waiver within one year of use of such waiver, and State agencies are required to submit a summary report of local agency usage of waivers under this Section within 18 months. This would mean states will be required to report to FNS as early as March 2021, depending on the waivers they may have used.

Section 2204(a)(1) gives State agencies administering WIC and the WIC Farmers Market Nutrition Program (FMNP) the opportunity to request a waiver or modification of qualified regulatory requirements from USDA if such requirements cannot be met due to COVID-19, and such waivers are necessary to provide assistance to WIC and WIC FMNP participants. State and local agencies are required under this Section to provide FFCRA reporting data to USDA no later than one year after such waivers were granted, detailing their use of the waiver and how it improved services to women, infants and children. FNS will collect this FFCRA Reporting Data through State and local online forms, along with an MIS data extraction (Error: Reference source not found Error: Reference source not found Error: Reference source not found Error: Reference source not found).

In addition, Title II of the FFCRA allows a number of adjustments to the Child Nutrition Programs and with those adjustments requires the States to report to the Secretary of Agriculture how they used the waivers and whether they improved services to children. In order to comply with the requirements of the FFCRA, FNS will ask the States to report the required data points on existing FNS forms. These data will be collected electronically using the existing remarks fields in the FNS Food Program Reporting System (FPRS). The waiver requests are covered within existing OMB information collections (0584-0280; 0584-0012; 0584-0006); The data reporting is also covered in an existing OMB information collection (0584-0594, exp. 7/31/23) but FNS is requesting additional burden hours related to the data reporting through this request package (Error: Reference source not found).

In all the instances described above, the information collection includes burden on State agencies for **requesting flexibilities** due to COVID-19 and reporting to FNS required **FFCRA Reporting Data** on how the waiver has impacted State operations. For WIC it includes some local agency burden for **FFCRA Reporting Data** as well.

Additionally, FNS is asking State agencies to report use of USDA commodities used during a disaster on a more frequent basis. This information is currently collected in an OMB approved form, the FNS-292A, Report of Commodity Distribution for Disaster Relief (OMB Control Number 0584-0594, exp. 7/31/23). State distributing agencies may release commodity or donated foods procured by the Department of Agriculture (USDA) to disaster organizations to provide nutritional assistance to disaster victims. Normally, State distributing agencies provide a summary report to FNS within 45 days following termination of the disaster assistance, and maintain records of these reports and other information relating to disasters. FNS will ask states to submit the form weekly. This change will help FNS Food Distribution (FD) staff monitor levels of USDA commodities more frequently to ensure States have access to USDA commodities throughout the public health crisis.

In sum, through this renewal, FNS is requesting:

Table 1

		OMB #	Type of Request	How submitted; frequency	Assoc.Docs.
SNAP	Waiver Requests	0584-0083 Exp.8/31/23	This information is approved under the referenced IC; We are asking for <u>additional burden</u> to cover the COVID-related waiver requests.	Email; as needed	Error: Reference source not found
	FFCRA Reporting Data	0584-0654 Exp.11/30/20	This information was approved in the Emergency IC package referenced. <u>This request renews this collection with additional burden hours</u> to cover a longer time period.	Email; as needed, per use of waivers	Error: Reference source not found
	Weekly Operational Update	0584-0083 Exp.8/31/23	This information is approved under the referenced IC; States are required to submit this information in their State Plans and are required to update FNS of any changes. Because COVID is rapidly changing, <u>FNS is seeking additional burden</u> so states can report <u>up to</u> weekly, as needed, of any changes to their state plans due to COVID (i.e., SNAP applications; office closures; staff reductions). Note this is an estimate of the <u>maximum</u> burden FNS might need for States; it could be less because the reporting is based on the level of changes, which varies based on the COVID data and need in a state at a given time.	Email; weekly	Error: Reference source not found
	Continuing Res. Options	0584-0654 Exp.11/30/20	The CR adjusted how states can apply for a waiver. Instead of applying, they can simply inform FNS that they are using it within 5 days of adoption.	online form; as needed	Error: Reference source not found
WIC	Waiver Requests	0584-0654 Exp.11/30/20	This information was approved in the Emergency IC package referenced. <u>This request renews this collection with additional burden hours</u> to cover a longer time period.	online form; as needed	Error: Reference source not found
	FFCRA Reporting Data	0584-0654 Exp.11/30/20	This information was approved in the Emergency IC package referenced. <u>This request renews this collection with additional burden hours</u> to cover a longer time period. Note that in the Emergency IC FNS was trying to collect the data via State Plans but determined <u>for reducing burden on states</u> and improving FNS's ability to analyze the data, FNS has moved to a State and Local agency online form coupled with some administrative data pulled from states' MIS systems.	online form; once	

	* State FFCRA Reporting Data online form				Error: Reference source not found
	* State MIS data pull				Error: Reference source not found
	* Local FFCRA Reporting Data online form				Error: Reference source not found
FMNP	Waiver Requests	0584-0654 Exp.11/30/20	This information was approved in the Emergency IC package referenced. <u>This request renews this collection with additional burden hours</u> to cover a longer time period.	Online form; as needed	Error: Reference source not found
	FFCRA Reporting Data	0584-0654 Exp.11/30/20	This information was approved in the Emergency IC package referenced. <u>This request renews this collection with additional burden hours</u> to cover a longer time period. Note that in the Emergency IC FNS was trying to collect the data via State Plans but determined for reducing burden on states and improving FNS's ability to analyze the data, FNS has moved to a State and Local agency online form.	Online; once	Error: Reference source not found
CN	Waiver Requests	0584-0280; Exp. 10/31/22 0584-0012; Exp.4/30/22 0584-0006 Exp.7/31/23	This activity is covered in the referenced IC and falls within existing burden approvals; <u>FNS is not seeking anything related to CN waivers</u> in this IC request.		
	FFCRA Reporting Data	0584-0594 Exp.7/31/23	These three forms are covered under the referenced IC. <u>FNS is seeking additional burden</u> for the burden associated with adding the requested information to the remarks section of these three forms.	FNS FPRS reporting system	Error: Reference source not found
	* FNS-10			FPRS; at 30&90 days	Error:

					Reference source not found
	* FNS-44			FPRS; at 30&90 days	Error: Reference source not found
	* FNS-418			FPRS; at 30&90 days	Error: Reference source not found
FD	Commodities Use (FNS292A)	0584-0594 Exp.7/31/23	This form is covered under the referenced IC. FNS is seeking <i>additional burden associated</i> with changing from a one-time report to a weekly report during COVID.	Email; weekly	Error: Reference source not found

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.

The information collection described here is necessary to ensure that State agencies are able to continue operations, including eligibility determinations and benefit issuance, under the unique circumstances resulting from COVID-19. As a result, households impacted by COVID-19 will be able to apply for and receive nutrition assistance while still observing social distancing requirements.

FNS will use the information in three ways:

- 1. Waiver and Notification of using options** will enable FNS to quickly and efficiently determine if they can approve waivers requested by States to operate the nutrition programs during the Public Health Crisis. Submitting a waiver is voluntary – States elect whether or not to request a waiver. The waivers have information needed for quick decision-making.
- 2. Data Reporting required by FFCRA** will be used to report to Congress in required reports how the waivers were used, how many people they reached, and whether or not they improved program efficiency during the Public Health Crisis. FNS staff will compile the data and consider States' and local agencies' comments on program effectiveness and impacts on participants and consider lessons learned for the immediate situation. It will also help FNS consider how best to respond in the future should the need arise.
- 3. Data Reporting needed to monitor levels of commodity use and availability.** The Food Distribution data collected will enable FNS to monitor distribution of USDA commodities by State education and welfare agencies following disasters. This is being requested in order for FNS Food Distribution (FD) staff to monitor levels of USDA commodities more frequently to ensure States have access to USDA commodities over time. Form FNS-292A is used by State distributing agencies to provide a summary report to FNS of disaster commodity food assistance and to request replacement of commodity foods distributed during the disaster or situation of distress. Information collected on FNS- 292A will be used by the FNS Administrator and the Food Distribution Division to monitor program activity, assess coverage provided to needy recipients, assure the validity of requested commodity reimbursements and to prepare budget requests. Data from Form 292A has been used in the past to report to the Secretary of Agriculture, the Federal Emergency Management Agency, the White House and Congress on FNS disaster relief efforts.

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 compliance with E-Government Act of 2002 (E-Gov), State agencies have the authority to use the technology that best suits the needs of their individual or unique systems of operation to comply with the

reporting and recordkeeping requirements contained in this submission. FNS has made every effort to provide for electronic submission as an alternative to paper submission in compliance with the E-Gov. FNS provides funding to support the development of electronic systems through Federal matching of States' administrative costs.

State submission of *waiver requests* and *FFCRA Reporting Data information* is a combination of online, fillable forms and online forms and submission via email. The specific methods per type of information are shown in Table 1. In sum, out of 13,452 responses for this collection, FNS estimates that 6,198, 46.1% will be collected electronically.

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.

All of the information being collected for this effort are specific to COVID and are not being collected elsewhere.

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.

This collection does not have a direct impact on small businesses or other small entities. State agencies, or entities considered State Agencies, such as Indian Tribal Organizations (ITOs), administer the FNS programs at the State level and collect the necessary data to ensure correct eligibility determinations and delivery of benefit. The State agencies are not considered small entities. Similarly, Local WIC Agencies are government agencies at the local level and are not considered small businesses or entities.

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 data collection that is required under statutes arising from the COVID-19 pandemic. States can elect whether or not to utilize a waiver or flexibility. If they do so, they will be required to submit FFCRA Reporting Data information required by FFCRA. If States use commodities during this time, they will be required to report on FNS292A. Were FNS not to collect the data associated with FFCRA requirements and other pandemic response, FNS would not be following FFCRA's requirements and would not be able to issue waivers, collect information for pandemic response-related funding, report on the flexibilities' use and efficacy, or provide monitoring and tracking of the pandemic response.

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;**

As shown in Table 1 FNS is requesting that State agencies report the SNAP weekly operational update *up to* weekly, though this will change based on the level of COVID need in a given state, and the USDA commodities used during a disaster on a weekly basis. The burden estimate is the maximum amount (52 weekly reports in a year) but in practice has been less as states' needs increase and decrease over the course of the pandemic. Child Nutrition State Agencies will report according to the approved schedule in

the corresponding collection (0584-0594), which includes a 30-day and 90-day report. The other information collections are one-time only.

- **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 other 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.

FNS posted a Notice on August 27, 2020 85 FR 52942 (Error: Reference source not found). The Agency received six public comments (Error: Reference source not found). Two referenced other data collections. One did not reference this data collection or any specific activities and was deemed not germane to this collection. The other three were highly supportive of the data collection and noted that the burden estimates were appropriate and the information collection was necessary. One, from the School Nutrition Association (SNA) noted appreciation for using existing forms to the extent possible to collect data so schools did not have to create new data collection processes. FNS thanked the

commenters (Error: Reference source not found) and concluded that changes due to these comments were not needed and was assured by SNA’s endorsement that using existing processes to the extent possible was a burden-reducing decision.

FNS consulted five subject matter experts for guidance on the online forms. The experts responded that the questions were worded such that the intended audiences would be able to understand them well and that the burden estimates were within reasonable assumptions.

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Amy Malinowski, RD	Public Health Nutrition Specialist Vermont Department of Health	Amy.Malinowski@vermont.gov 802-652-4186
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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 complies with the Privacy Act of 1974. No confidential information is associated with this collection of information and no such assurances of confidentiality are provided. This ICR does not request any personally identifiable information nor does it contain any forms that require a Privacy Act Statement.

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.

No private or sensitive questions will be asked.

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.

As shown in Error: Reference source not found, FNS anticipates two types of respondents: State Government workers and Local Government workers at WIC agencies. Together, their reporting burden is **19,889.73**

burden hours. Note that the estimates below assume data collection over one year, though they will be revised should the Public Health Crisis timeline differ.

In all cases, the estimates were calculated based on the number of submissions and the length of time each submission would take to submit. The estimates for seeking waivers and flexibilities range from two for SNAP to up to 14 for WIC. Weekly activities are submitted 52 times; monthly submissions are 12 times. The amount of time it takes to submit varies by the type of information, ranging from 20 minutes up to 10 hours. The calculations and details are shown in Error: Reference source not found and Error: Reference source not found

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

The information collection burden falls on two categories of government employees: State program staff and, for the WIC waivers, program staff who work for Local WIC Agencies. Standard wage rate categories used in determining annualized burden costs were based on the most recent Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data, using the corresponding occupation code 11-9151, Social and Community Services Managers(<https://www.bls.gov/oes/current/oes119151.htm>). According to the BLS data, workers in this occupation earn a median wage rate of \$35.05 per hour. States would incur an annualized administrative cost of \$35.05 per hour burden in the information collection.

For SNAP, fifty percent of administrative costs incurred by State agencies are reimbursed by FNS. Half of the \$35.05 per hour wage rate is \$17.53 per burden hour.

As shown in Error: Reference source not found, the initial State and Local costs are **\$419,811.31**.

In order to account for fringe benefits (fully-loaded wage rates), an additional 33% of the initial cost has been added. With the fully-loaded rate, the total annual respondent cost is **\$558,349.04**.

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.

FNS does not expect any additional annual cost burden to respondents or recordkeepers.

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.

As shown in the Federal Cost section at the bottom of the Error: Reference source not found the total federal cost is **\$1,297,699.96**.

This comes from three cost categories, all of which assume a GS13, step 1 Federal worker in the Washington, DC area examines the information. Current federal hourly wage rates for the Washington, DC area, based on OPM information is \$49.19 per hour (Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx)). The fully-loaded rate adds 33% for fringe benefits, bringing the hourly wage rate to \$65.42.

SNAP Administrative Cost Sharing. SNAP funds cover 50% of State Administrative costs:

\$ 277,482.02

Federal Staff to examine waiver data:

\$ 43,587.87

Federal staff to examine FFCRA Reporting Data:

\$ 925,600.36

Federal staff to examine commodities use (FNS292A):

\$ 51,029.71

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 request has multiple components.

This is a request for burden over the existing burden approvals as described in Table 1. This new information collection request is the result of program changes and will add **12,894** burden hours and **7,458** responses to OMB's inventory, and a request to collect FFCRA Reporting Data required by FFCRA.

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.

FNS will publish a report of the findings based on the FFCRA Reporting Data on its website. FFCRA Reporting Data collection and reporting will follow approximately the following schedule:

- February 2021 FFCRA Reporting Data Online forms Launched (note, this timing is necessary to meet the FFCRA deadlines of reporting within 12 and 18 months of first use of a waiver; reporting varies by type of waiver used).
- August 2021 Data Collection Complete
- December 2021 Data Compilation Complete
- March 2022 Report Publication

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."

FNS does not have any exceptions to the certification statement