

**SUPPORTING STATEMENT – PART A for**

**OMB No. 0584–0594**

**FOOD PROGRAMS REPORTING SYSTEM REPORTING REQUIREMENTS**

Associated with Final Rule: “Employment and Training Opportunities in the Supplemental

Nutrition Assistance Program,” (RIN 0584-AE68)

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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 is a revision of a currently approved information collection. The Department of Agriculture Food and Nutrition Services (FNS) is not seeking a three-year renewal with this request of the Food Programs Reporting System (FPRS). This request covers only the changes made to two forms: (1) FNS-583 and (2) FNS-366B within FPRS; the agency plans to follow-up with the three-year renewal process to cover all forms not submitted in this request. FNS will seek approval from the Office of Management and Budget (OMB) for the entire information collection before July 2023. The Food Programs Reporting System (FPRS) is the primary collection point for program performance statistics and financial data from State agencies (SA), Indian Tribal Organizations (ITO), and U.S. Territories participating in the nutrition assistance programs. FPRS facilitates data gathering for the reporting of data for the Supplemental Nutrition Assistance Program (SNAP). FNS issued a 60 day notice on October 8, 2021 entitled “Food Programs Reporting System (FPRS).” This information collection pertains to a change in two forms used by SNAP within FPRS: the FNS-583 (Attachment 4) and the FNS-366B (Attachment 7).

*FNS-583*

FNS intends to update the form FNS-583 to reflect changes made as a direct result of the final rule 7 CFR Parts 271 and 273 titled, “Employment and Training Opportunities in the Supplemental Nutrition Assistance Program,” RIN 0584-AE68, published January 5, 2021, (86 FR 358 Attachment 2). The information collection burden associated with Employment and Training (E&T) final rule was approved under OMB Control Number: 0584-0653; Expiration

Date: March 31, 2024. The OMB term of clearance for this Information Collection Request (ICR) was that FNS would merge the burden hours for additional data elements on the FNS-583 (currently approved under OMB Control Number: 0584-0653; Expiration Date: March 31, 2024) into the information collection for FPRS (OMB Control Number: 0584-0594; Expiration 7/21/2023).

In accordance with Section 16(h)(5) of the Food and Nutrition Act (FNA), as amended by section 4022 of the Agriculture Act of 2014, and 7 CFR 273.7(c)(9), the Department requires State agencies to submit an E&T Program Activity Report on a quarterly basis. To complete this reporting requirement, States use form FNS-583 within the online FPRS.

In order for FNS to monitor the effectiveness of mandatory E&T programs, via the final rule (Attachment 2) in 7 CFR 273.7(c)(11), the Department added four additional reporting requirements to the fourth quarter report related to mandatory E&T participants. State agencies running E&T programs requiring mandatory participation must report these additional data elements on the Federal Fiscal Year fourth quarter report of the FNS-583 to FNS using the FPRS database.

#### *FNS-366B*

In accordance with the Food and Nutrition Act of 2008 (the Act), and 7 CFR 272.2 (c)(1)(ii) of SNAP regulations, the Department requires that State agencies report quarterly certification activity data to FNS using form FNS-366B within the online Food Program Reporting System (FPRS). The information collection burden associated with the FNS 366B form was approved under OMB Control Number: 0584-0594; Expiration Date: Date: July 31, 2023. The recordkeeping burden for the FNS-366B form is currently covered under OMB number 0584-0083; Expiration Date: August

31, 2023. FNS does not anticipate the changes to the FNS-366B will impact the current reporting or recordkeeping burden.

The FNS-366B, in its current form, does not differentiate between expedited initial applications and expedited recertification. In order to effectively monitor SNAP State agencies' certification activities and timeliness compliance in accordance with Federal law, FNS is proposing to break down this data point into two separate data collection points. All 53 SNAP State agencies will be required to report accordingly using the FPRS database.

## **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.**

Using the FNS forms, State and Local agencies, and Indian Tribal Organizations (ITOs), who enter into agreements with the Federal government, use FPRS to submit data to FNS electronically. The data is gathered, collected, and submitted at various times, ranging from monthly, quarterly, semi-annual, annual or final submissions. This information is collected, gathered, and used by FNS to conduct program evaluation, planning and audits, future funding, research, regulatory compliance and general statistical projections.

FNS-583

The purpose of the E&T Program Activity Report (FNS-583) submitted and maintained in the online Food Programs Reporting System (FPRS) is to collect standard and consistent information on all States and Territories. The items collected and identified on the form include Work Registrants, E&T Participation, Able-Bodied Adults Without Dependents (ABAWD), Program Activities, and Components funded through the SNAP Office of Employment and Training (OET). The data collected by State agencies through the FNS-583 is used by FNS to help with management decisions, supports policy initiatives, and provides insight into where OET can best offer Technical Assistance to States, thus supporting planning within the agency.

In this information collection, the Department is requesting to add four additional reporting requirements to the FNS-583, as stated in 7 CFR 273.7(c)(11)(iii) and 7 CFR 273.7(c)(11)(iv), as a requirement for State agencies operating mandatory programs to report on the Federal Fiscal Year fourth quarter report of the FNS-583.

The four (4) mandatory data elements include:

1. The number of SNAP applicants and participants required to participate in E&T by the State agency.
2. Of those required to participate, the number who begin participation in an E&T program.
3. Of those required to participate, the number who begin participation in an E&T component.
4. The number of mandatory E&T participants who were determined ineligible for failure to comply with E&T requirements.

In addition to the four newly required elements, an optional, non-rulemaking section for States to voluntarily report on case management will also be added to the FNS-583.

The one (1) optional data elements include:

1. The number of E&T participants who received case management services.

While offering case management services for every E&T participant is required, the Department does not currently require States to report on the number of individuals that receive case management services on the FNS-583. However, many State agencies track the provision of case management services and may wish to report on those activities in their 4th quarter FNS-583 report. The Department requests to include in this revision of the FNS-583 a section that would allow States the option to report the number of individuals that receive case management services.

Again, the reporting of case management data is optional, but is intended to assist FNS in monitoring State's implementation of the mandatory case management offering and increase State's accountability.

The Department is committed to ensuring that State agencies are providing mandatory E&T participants with opportunities to gain skills and appropriate services that help them be successful. Furthermore, this new information will provide both State agencies and the Department with important information to address the need to support improved oversight of State mandatory E&T programs. Due to the increase in information to be collected from State agencies, it will increase the time it takes to complete the form as well as the number of responses, thus increasing the burden. This change will not increase the number of respondents.

#### FNS-366B

The FNS-366B, Program Activity Statement, is FNS' primary means of collecting data on the integrity and certification activities of State SNAP agencies. The Certification section of the FNS-

366B is used to track the number of initial and recertification applications approved or denied by the State agency in the specified reporting quarter, as well as the number of applications that were approved outside the 7 or 30 day application processing requirements.

After a recent policy review, FNS determined updates to the FNS-366B were needed to further refine currently collected metrics related to SNAP recertification policy. Households that file a recertification application within 30 days of the end of their certification period are entitled to expedited service, if eligible. While the FNS-366B currently collects aggregate data on expedited applications on its current form, the form does not differentiate between expedited initial applications and expedited recertification applications. FNS is proposing an internal exploratory effort to update the form to make this distinction. With the form changes, FNS will be able to collect disaggregated data on expedited applications, which will help inform the monitoring and tracking of timeliness compliance and identify opportunities for additional technical assistance.

### **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.**

The collection of the FNS-583 and FNS-366B are collected and submitted electronically through the Food Programs Reporting System (FPRS), at <https://fprs.fns.usda.gov/>, and FPRS is 100% electronically operated. Thus, this will not change the use of automated, electronic, or other technological collection techniques from the State agencies. FNS has included the user home screen which displays the OMB control number, expiration date and public burden statement (Attachment 3).



#### **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.**

##### FNS-583

There is no similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA recordkeeping requirements, State administrative agency recordkeeping requirements, and special studies by other government and private agencies. FNS solely monitors and administers SNAP.

##### FNS-366B

FNS collects timeliness data by calculating State agencies' application processing timeliness rates (APT). This information is collected through Quality Control (QC) sample data. To calculate the rate, FNS divides the number of initial SNAP applications approved timely within the 7- or 30-day processing requirement, by the total number of applications approved within the same timeframe, and multiplies by 100. Though it would seem duplicative to collect additional timeliness data, the FNS-366B specifically tracks application decisions for the entire SNAP caseload that were overdue by 1-30 days, 31- 60 days, 61-90 days, and 91 days. This FNS 366B differs from that reported by QC, as QC data only represents a sample of cases and does not include information related to the length of time a case has been pending. The purpose of collecting overdue counts of applications and recertification is to help FNS both identify States that may be in need of technical assistance, and identify States that have an efficient process where best practices can be gleaned.

#### **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.**

No small entities are impacted by this collection of information for the FNS-583 or FNS-366B.

**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.**

Without the FNS-583 data collection, FNS will be unable to meet its legislative and regulatory reporting requirements for the affected programs per Section 16(h)(5) of the Food and Nutrition Act (FNA), as amended by section 4022 of the Agriculture Act of 2014. This is an on-going, mandatory information collection. The updates to the FNS-583 and FNS-366B do not impact the frequency of the data collection.

Additionally, if the collection is not conducted, FNS will continue to be severely limited in understanding effective E&T practices, specifically in mandatory States, and will not be able to provide targeted assistance to States to improve their E&T operations. Furthermore, without the FNS-366B data collection, FNS will continue to collect aggregate data on expedited applications, without a clear distinction between initial applications and recertification due for expedited service. Beyond the FNA requirement that measures be reported annually, less frequent reporting would result in FNS frequently relying on outdated information.

**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 October 8, 2021, FNS published a 60 Day Notice in the *Federal Register* (FR) Volume 86, No. 193, Page 56240. FNS received no public comments.

The following individuals/organizations were consulted about burden estimates associated with this data collection: 1) Stephanie M Boshart, New York State Office of Temporary and

Disability Assistance, [Stephanie.Boshart@otda.ny.gov](mailto:Stephanie.Boshart@otda.ny.gov), 2) Matt Lyons, American Public Human Services Association, [mlyons@aphsa.org](mailto:mlyons@aphsa.org), 3) Robertine Stewart, Louisiana Department of Children and Family Services, [Robertine.BurchellStewart.DCFS@LA.GOV](mailto:Robertine.BurchellStewart.DCFS@LA.GOV). The State of Louisiana was the only entity to submit comments (Attachment 9). The comments asked if there will be an additional section on the FNS-583 other than section number six to capture the new information for mandatory programs, and if that additional section would also be used to capture information for Able-Bodied Adults Without Dependents (ABAWDS) and Non-ABAWDS. Additionally, the comment asked for an explanation of the reason for reporting the number of participants who received case management, when it is a mandatory requirement to provide case management for all SNAP E&T participants. FNS replied to these comments (Attachment 10), stating that these four data elements for mandatory States will be the only new requirements, inclusive of the entire State population and inclusive of ABAWDS and Non-ABAWDS. There will be additional lines available to enter in the responses for each of the four additional reporting components for mandatory States which will be labeled as the lines nine through twelve, as well as an additional section for the voluntary reporting of case management participants. The response also explained that the reason for the optional reporting section for the number of participants who received case management is because the Department does not capture this information on any other form. Furthermore, prior to the addition of case management services introduced by Employment and Training Opportunities Rule, some State agencies had requested the ability to track the provision of intake actions such as orientation or assessment. FNS is just further expanding the State agency's ability to monitor the types of case management services provided by their providers, if the State agency so chooses to utilize this function of the FNS-583.

**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 individual or household data is collected nor maintained in this system. Users are authenticated using USDA e-Authentication, which is covered by the USDA/OCIO-2 eAuthentication Service SORN published March 14, 2012 in FR 77 Page 15024 (Attachment 13). State, Local or Tribal Agencies are assigned codes by FNS as an identifier for States only no personal information from individual staff is required.

The data will be collected in aggregate form and respondents will not be identified individually.

Authorized Users: Contractors are required to comply with all provisions of the Privacy Act.

Contractors are required to maintain and protect the data and cannot release or share data without consulting with FNS. Access to records maintained within FNS is limited to those staff officials responsible for the subject matter. Otherwise, access is limited to persons authorized and needing to use the records, including project directors, project officers, contract officers, programmers, analysts, statisticians, statistical clerks and key punch operators on the staff of the contractors or in the FNS.

Additionally, a Privacy Impact Assessment was conducted in June 2007 on the FPRS (Attachment 14) which determined that FNS does not need to publish a SORNs.

The FNS Privacy Officer reviewed the 60-Day Notice submission, the comments to the 60-Day

Notice, and FNS' response to the comments. This information collection request was reviewed and cleared by FNS Privacy Officer, Michael Bjorkman, on 1/21/2022 (Attachment 11).

**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 current total annual burden hours for FPRS is 102,044 with 47,157 total annual responses.

The updates to the FNS-366B form will not impact the burden estimates for this form; therefore, the estimates for FNS-366B remains unchanged. The recordkeeping burden for the FNS-366B form is currently covered under OMB number 0584-0083; Expiration Date: August 31, 2023, the agency is not seeking to change those estimates for recordkeeping.

The updates to the FNS-583 will increase the requested burden hours by increasing the number of responses required annually. FNS estimates that 17 of the currently reporting 53 States and Territories will be responsible for the new additional reporting requirements, as there are 17 States running a mandatory program that would be subject to the new data elements required in

the fourth quarter report. Because these 17 States and Territories will be the same 53 State, Local, and tribal Governments that are reporting on the rest of the FNS-583, the number of respondents will remain the same.

The estimated time per response for each of the 17 States is four hours, totaling 68 additional hours for the new four data elements for mandatory States. In addition, the non-rulemaking addition of case management reporting would increase the number of responses. About 15 of the currently reporting 53 State agencies are estimated to choose to report on the new optional elements of case management services. The estimated time per response for the non-rulemaking is 1.25 hours to report the optional case management. The addition of the optional 1.25 hours to report on case management increases the overall burden to be added to FPRS is 69.25 hours.

The requested burden hours associated with this collection and the cost to respondents are shown in the attached burden chart.

**Total Revised Reporting Burden Estimates for the FNS-583**

	Respondent	Form	Estimated # Respondent	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dxe)
<b>Reporting Burden</b>							
Currently Approved Reporting Burden for the FNS-583 in 0584-0594 (expiration 7/31/2023)	State Agency Administrative Staff	FNS 583	53	4	212	98	20,776.00
Currently Approved Additional Data Request – Mandatory Reporting (Burden to be merged from 0584-0653 to 0584-0594)	State Agency Administrative Staff Running Mandatory Programs		17	1	17	4	68

NEW Optional Reporting of Case Management (NEW burden to be added to 0584-0594)	State Agency Administrative Staff		15	1	15	0.0835	1.2525
<b>Total Burden to be added to 0584-0594</b>			<b>32</b>	<b>2</b>	<b>32</b>	<b>4.0835</b>	<b>69.2525</b>
Grand Total Burden Estimates for FNS 583			53	4.6037735 85	244	85.43136 27	20,845.25

**Total Revised Reporting Burden Estimates for FPRS (OMB Control Number 0584-0594)**

Respondent	Instrument/Form	Estimated # Respondents	Responses annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. dxe)
<b>Reporting Burden</b>						
Total Burden to be added to 0584-0594		32		2		69.25
Currently Approved Burden in in 0584-0594		12,708		47,157		102,044
<b>Overall Grand Total for 0584-0594</b>		12,708		47,159		102,113.25

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

The total annual respondent cost for FPRS is \$4,258,343.54.

FNS does not anticipate that the changes to the FNS-366B will impact the current reporting or recordkeeping burden. As such, the Department estimates the net cost to State agencies for these activities is \$0. The estimate of respondent cost is based on the burden estimates and utilizes the U.S.

The FNS-538 will impact the current recordkeeping burden by increasing the annual hour burdens for State agency employees. According to the Department of Labor, Bureau of Labor



Statistics ([https://www.bls.gov/oes/current/oes\\_nat.htm#13-0000](https://www.bls.gov/oes/current/oes_nat.htm#13-0000)), May 2021 National Occupational and Wage Statistics, Occupational Group (13-1141) has an hourly mean wage for functions performed by State agency workers for the SNAP program are estimated at \$30.83 median hourly wage per staff. The updates to the FNS-583 will add 69.25 hours annually to the process of reporting requirements in FPRS.

1. At \$30.83 per hour, the base annual respondent cost for the FNS-583 is estimated at \$642,659.06 ( $\$30.83 \times 20,845.25$  hours). An additional 33% of the estimated base annual respondent cost in fringe costs, equaling \$212,077.49, must be added to represent fully loaded wages. Thus the total annual respondent cost for the FNS-583 is \$854,736.55.
2. At \$30.83 per hour, the base annual respondent cost for FPRS is estimated at \$4,258,343.54 ( $\$3,146,016.52$  total annual cost ( $\$30.83 \times 102,044$ ) + \$1,038,185.45 fringe benefits).

**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 estimated cost for the creation of this ICR package to the Federal government is \$3,632,048.

The changes made to FNS-583 and 366B do not result in new Federal employees reviewing and processing these forms, nor changes to the grade/step of the Federal employees reviewing and processing these forms. Thus, the changes in the FNS-583 do not alter to the amount of time that Federal staff spend reviewing and processing these forms. It is estimated that the annualized cost of the FPRS system to the Federal government is \$12,267,529.46 (\$9,224,227.71 total annual cost + \$3,043,301.75 fringe benefits).

The one-time cost of the FNS employee time for preparing, reviewing or monitoring this data collection is \$3,487,920 (\$87,198\*40 hours) to prepare this ICR by a GS 12 Step 1 Program Analyst. An additional \$144,128 (\$144,128\* 1 hour) for the review by a GS 15 Step 1 Director.

**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.**

The currently approved burden for OMB# 0584-0594 is 102,044 total annual burden hours and 47,157 total annual responses. This is a request to transfer 68 hours from OMB Control Number 0594-0653 and merge into OMB Control Number 0584-0594 due to changes in reporting in the FNS-583. The majority of the revisions are due to an adjustment, which will add four new data elements for States operating mandatory E&T programs to the FNS-583 and will impact the burden for FNS-583 by increasing the burden hours by 68 annual hours. Additionally, there is a program change due to non-rulemaking, optional, reporting measure being added to the FNS-583 that would increase the burden hours by 1.25 hours. These revisions will in turn increase the

overall burden for OMB# 0584-0594 by 69.25 estimated total hours annually, resulting in a new overall burden for OMB# 0584-0594 of 102,113.25 total hours. This burden will also be shown in the Excel burden chart (Attachment 5) included with this submission.

**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.**

We are not seeking approval concerning the display of the expiration date.

**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.