

**SUPPORTING STATEMENT - for**  
**OMB Control Number 0584-0336:**  
**Disaster Supplemental Nutrition Assistance Program (D-SNAP)**

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**Table of Contents**

**A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3**  
**A2. PURPOSE AND USE OF THE INFORMATION.....3**  
**A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....4**  
**A4. EFFORTS TO IDENTIFY DUPLICATION.....4**  
**A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....4**  
**A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....5**  
**A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....5**  
**A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....6**  
**A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....6**  
**A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....7**  
**A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....7**  
**A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....7**  
**A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....9**  
**A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....10**  
**A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....10**  
**A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....11**  
**A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....11**  
**A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....11**

**Appendices**

- Appendix A: Section 5(h) of the Food and Nutrition Act of 2008
- Appendix B: Section 412 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act
- Appendix C: D-SNAP Request Template
- Appendix D: WIMS Screenshot
- Appendix D.1: WIMS Public Burden Statement
- Appendix E: FNS 292A Screenshot
- Appendix F: FNS 292B Screenshot
- Appendix G: FNS 366A Screenshot
- Appendix H: FNS 366B Screenshot
- Appendix I: FPRS Public Burden Statement
- Appendix J: 65 FR 17251 - Privacy Act: Proposed New System of Records
- Appendix K: Burden Table

**A1. Circumstances that make the collection of information necessary.**

**Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This is an extension of a currently approved collection. Pursuant to Section 5(h) of the Food and Nutrition Act of 2008, 7 U.S.C. 2014(h), the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 et seq., the Secretary of Agriculture has the authority to allow a State agency to operate a Disaster Supplemental Nutrition Assistance Program (D-SNAP), which is a temporary program to provide nutrition assistance to households affected by disasters (See Appendices A and B). D-SNAP is separate and distinct from the Supplemental Nutrition Assistance Program (SNAP) because it has different standards of eligibility, is operated for a limited duration, and only provides one month's worth of benefits to eligible households.

State agencies submit formal requests to operate D-SNAP to the Food and Nutrition Service (FNS) via the Waiver Information Management System (WIMS); States may only request to operate D-SNAP in areas that have received a Presidential Disaster Declaration with authorization for Individual Assistance, also known as an IA declaration, from the Federal Emergency Management Agency (FEMA). In their D-SNAP requests, State agencies outline their proposed procedures for conducting D-SNAP operations, designate the areas where they wish to operate, and provide supporting information. FNS reviews all D-SNAP requests and supporting information to ensure that all necessary requirements to operate D-SNAP are met. Using clearly defined FNS' criteria, FNS created a template (see Appendix C) for State agencies submit their D-SNAP requests electronically through WIMS (See Appendix D and D.1).

## **A2. Purpose and Use of the Information.**

**Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.**

In their requests, State agencies must outline their proposed procedures for operating D-SNAP and provide other supporting information, such as: an assessment of the areas where D-SNAP will be operated; the criteria that will be used to determine eligibility of applicants; how long applications will be accepted; methods to maintain program integrity; procedures for issuing Electronic Benefits Transfer (EBT) cards to eligible applicants, and other logistics regarding public information, application site locations, and staffing. FNS reviews each request and supporting information to ensure that all necessary requirements for an effective and efficient D-SNAP operation are met.

The burden associated with the certification of D-SNAP applicants by a State agency is currently approved under OMB information collection 0584-0064 (SNAP Forms: Applications, Periodic Reporting, Notices; expiration date: 02/29/2024). The reporting and recordkeeping burden for State reporting of D-SNAP data on the FNS-292A (Report of Commodity Distribution for Disaster Relief) and FNS-292B (Report of Disaster Supplemental Nutrition Assistance Benefit Issuance) is covered under two separate OMB Control Numbers. The recordkeeping burden for FNS-292A and FNS-292B is approved under OMB Control Number 0584-0037 (expiration date: 05/31/2024) and the reporting burden for the FNS-292A and FNS-292B is approved under OMB Control Number 0584-0594 (Food Programs Reporting System; expiration date: 07/31/2023) (See Appendices E, F, and I). Neither burden is reflected in this submission.

### **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 2020, FNS launched an electronic workflow system, the Waiver Information Management System (WIMS), to streamline FNS waiver processing. The burden for submitting waiver requests via WIMS is covered under OMB Control Number 0584-0083 (Operating Guidelines, Forms, and Waivers, Program and Budget Summary Statement (Forms FNS-366A & FNS-366B); expiration date: 08/31/2023) (See Appendices G, H, and I).

FNS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. Currently, all States submit D-SNAP requests to FNS via WIMS at <https://www.wims.fns.usda.gov> (See Appendix D); as such, we anticipate 100% of responses will be submitted 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.**

Every effort has been made to avoid duplication. Also, there is no similar information available because FNS is solely responsible for authorizing State agencies to operate D-SNAP. The information required for approval is not reported to any other entity outside of FNS.

The burden associated with the certification of D-SNAP applicants by a State agency is currently approved under OMB information collection 0584-0064 (SNAP Forms: Applications, Periodic

Reporting, Notices; expiration date: 02/29/2024). The reporting and recordkeeping burden for State reporting of D-SNAP data on the FNS-292A (Report of Commodity Distribution for Disaster Relief) and FNS-292B (Report of Disaster Supplemental Nutrition Assistance Benefit Issuance) is covered under two separate OMB Control Numbers. The recordkeeping burden for FNS-292A and FNS-292B is approved under OMB Control Number 0584-0037 (expiration date: 05/31/2024) and the reporting burden for the FNS-292A and FNS-292B is approved under OMB Control Number 0584-0594 (Food Programs Reporting System; expiration date: 07/31/2023). Neither burden is reflected in this submission.

**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.**

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

**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.**

D-SNAP is a vital FNS nutrition assistance response available to a State agency recovering from a disaster. If this collection is not conducted, States agencies would not be able to operate D-SNAP to help meet the temporary nutrition needs of households affected by disasters. This information is necessary to ensure that disaster procedures are promptly and effectively implemented and to ensure program integrity. This information is only collected and required to obtain benefits if a State agency wishes to operate D-SNAP in areas that have received an IA declaration from FEMA, or expand D-SNAP to additional areas that receive an IA declaration

after receiving an initial D-SNAP approval from FNS. In some cases, a State agency may find that operation of a D-SNAP is not warranted even upon receipt of an IA declaration, and may utilize other FNS disaster programs to assist impacted households.

#### **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. 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.**

A 60-day notice was published in the Federal Register on February 1, 2022 (87 FR 5457). No comments were received.

FNS consulted with three State agency representatives involved in requesting D-SNAPs. The consultation questionnaire asked State agency contacts for their feedback on burden estimates for information collection activities associated with requesting a D-SNAP. The individuals/organizations consulted about the information collection are listed in the table below.

Contact	Organization	Email	Phone
Kim Matherne	Louisiana Department of Children and Family Services	<a href="mailto:kim.matherne.dcfcs@la.gov">kim.matherne.dcfcs@la.gov</a>	(225) 219-2428
Lisa Cowell	Tennessee Department of Human Services	<a href="mailto:lisa.cowell@tn.gov">lisa.cowell@tn.gov</a>	(615) 741-5934
Jason Dunn	Kentucky Department of Community Based Services	<a href="mailto:jason.dunn@ky.gov">jason.dunn@ky.gov</a>	(502) 545-2943

FNS did not receive any responses on its requests for consultation, so FNS is proceeding with the initial estimates published in the 60-day notice.

**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.

The D-SNAP process does not require third party reporting or disclosure to any entities under any circumstances. FNS published the Privacy Act: System of Records Notice (SORN) on March 31, 2000, in the Federal Register (65 FR 17251) entitled “USDA/FNS-10 Entitled Persons Doing Business with the Food and Nutrition Service” to specify the uses of the information that is collected (See Appendix J). It does not cover SNAP recipients or State agencies. The SORN covers contractors and other business entities doing business with FNS.

Michael Bjorkman, USDA FNS Privacy Officer, reviewed and approved this submission on May 11, 2022.

**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 questions of a sensitive nature included 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 estimated burden for this information collection including the number of respondents, frequency of response, average time to respond and annual hour burden are shown in the attached Burden Table (Appendix K). A summary of the burden appears below.

### **Reporting Burden**

FNS estimates five (5) State agencies will submit two D-SNAP request each year, for a total annual response of 10 requests at 10 hours per response. FNS estimates the total burden for this provision to be 100 hours (5 State agencies x 2 requests annually x 10 hours per request = 100 hours). This burden estimate represents an increase of 50 hours from the previous submission for the activity. This increase is a result of an increase in the average number of D-SNAPs requested annually.

Out of the five (5) State agencies that submit two D-SNAP request each year, FNS estimates an average of two (2) State agencies will submit subsequent requests to modify or expand those already approved D-SNAPs. The Department is not double-counting these two (2) State agencies in the total number of respondents, but is including the burden for these submissions in the reporting burden calculation. FNS estimates that these two (2) State agencies will submit two (2) requests each year, for a total annual response of four (4) requests at three (3) hours per response. FNS estimates the total burden for this provision to be 12 hours (2 State agencies x 2 requests annually x 3 hours per request = 12 hours). This burden estimates represents an increase of six (6) hours from the previous submission for this activity. This increase is a result of an increase in the average number of D-SNAPs requested annually.

<b>Respondent/Activity</b>	<b>Citation</b>	<b>Number of respondents</b>	<b>Responses annually per respondent</b>	<b>Total annual responses</b>	<b>Number of burden hours per response</b>	<b>Estimated total burden hours</b>
<b>State Agency – Submission of D-SNAP Request</b>	Sec 5(h)(1) the Food and Nutrition Act of 2008	5	2	10	10	100
<b>State Agency – Submission of D-SNAP modification or expansion request</b>	Sec 5(h)(1) the Food and Nutrition Act of 2008	2	2	4	3	12
<b>Total Reporting Burden</b>		5	2.8	14	8	112

**Record Keeping Burden**

The recordkeeping burden for this information collection request is covered under the currently approved OMB information collection 0584-0037 (Report of D-SNAP Benefit Issuance and Commodity Distribution for Disaster Relief; expiration date: 05/31/2024). There is no additional recordkeeping burden or third-party disclosure burden associated with this request.

**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 annualized cost to respondents is \$2,842.56, including fully loaded wages, as depicted in the table below and in Appendix C. The wage rate used to determine the annual cost to respondents are based on May 2021 Occupational Employment Statistics estimates from the Bureau of Labor Statistics. The most recent data indicate a mean hourly wage of \$38.16 for Social and Community Service Managers<sup>1</sup> (State agency managers). FNS then multiplied this wage rate by .33 to reflect fully-loaded wages. FNS reimburses 50 percent of the administrative costs incurred by State agencies, so FNS calculated costs by using the fully-loaded wage rate,

<sup>1</sup> <https://www.bls.gov/oes/current/oes119151.htm>

minus 50 percent reimbursement, or \$25.38. The calculations for this cost are described in the table below:

Activity	Hourly wage rate <sup>2</sup>	Annual burden hours	Cost (US\$)
Submission of D-SNAP requests by State agency managers	\$25.38	100	\$2,538.00** Expression is faulty **
Submission of subsequent D-SNAP modification or expansion request by State agency managers	\$25.38	12	\$304.56** Expression is faulty **
<b>Total Annual Cost</b>			<b>0\$2,842.56</b>

**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 total annual cost to the Federal government for this data collection is \$16,290.08. This cost is based on average of 10 hours of review a D-SNAP request and draft an approval by a Program Analyst (GS-13/1), 2 hours of review by a Branch Chief (GS-14/1), and 1 hour of review by a

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<sup>2</sup> We have multiplied this wage rate by 1.33 to represent fully-loaded wages. However, 50% of administrative costs incurred by State agencies are reimbursed by FNS, which results in a reimbursement value of \$25.38 (\$38.16 x 1.33 x 0.50) per burden hour.

Division Director (GS-15/1) for each response received.<sup>3</sup> FNS used the hourly wage rates for the locality pay area of Washington-Baltimore-Arlington. FNS then multiplied this wage rate by .33 to reflect fully-loaded wages. The Federal cost also includes the cost associated with the preparation of this information collection package (5 hours) and reimbursement of 50% of State Administrative costs. The calculations for this cost are described in the table below:

<b>Review of State agency D-SNAP requests</b>	<b>Estimated Total Annual Burden Hours</b>	<b>Estimated Hourly Wage Rate</b>	<b>Cost (US\$) (approx.)</b>
Program Analyst (GS-13/1)	140	\$68.07	** Expression is faulty ** \$9,529.72
Branch Chief (GS-14/1)	** Expression is faulty **28	\$80.45	** Expression is faulty ** \$2,252.65
Division Director (GS-15/1)	** Expression is faulty **14	\$94.63	** Expression is faulty ** \$1,324.81
<b>Costs to Federal workers</b>			<b>\$13,107.18</b>
Preparation of IC request (5 hours by Program Analyst GS-13/1)			\$340.35
Add 50% Federal Share of State Cost			\$2,842.56
<b>Total Federal cost (Federal workers cost + 50% State Cost)</b>			<b>\$16,290.08</b>

**A15. Explanation of program changes or adjustments.**

**Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This is an extension of a currently approved information collection. The current burden inventory is 5 (five) State agencies, 7 (seven) total annual responses and 56 total annual burden hours. The revised request is seeking 5 (five) State agencies, 14 total annual responses and 112 total annual burden hours. This request reflects an increase of 5 (five) total annual responses. The reporting hours in this submission increased by 56 total burden hours. These adjustments are a direct result of the increased number of State D-SNAP agencies requests from Federal Fiscal Year (FY) 2019

<sup>3</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf)

through FY 2021. From FY 2019 to 2021, an average of 5 (five) State agencies requested and were approved to operate D-SNAP each year and an average of 2 (two) State agencies requested and were approved for a modification or extension. The number of hours per response and the number of respondents has not changed, but the estimated total burden hours has increased due to the increased number of State agency requests.

**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.**

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

**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."**

There are no exceptions to the certification statement.