#### **SUPPORTING STATEMENT - PART A for**

#### **OMB Control Number 0584-NEW:**

Generic Clearance for Stakeholder Feedback and Surveys as Part of FNS Planning:

Regulatory Actions, Semi-annual Regulatory Agenda, Program Changes, Research

Studies, Outreach, Training and/or Development of Guidance

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#### **Table of Contents**

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.	3
A2. PURPOSE AND USE OF THE INFORMATION	5
A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION	ນັ
A4. EFFORTS TO IDENTIFY DUPLICATION	10

A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES	11
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY	11
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5	12
A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.	
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS	16
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS	16
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE	17
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION	17
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN	19
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT	20
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS	20
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE	20
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE	20
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19	21

## **Appendices**

Appendix 1 - Executive Order 14094

Appendix 2 – OMB Guidance on Broadening Public Participation and Community

Engagement in the Regulatory Process

Appendix 3 – Published 60-day Federal Register Notice

Appendix 4 – Public comment submitted to Food and Nutrition Service

Appendix 5 – Response to public comment

## 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 new information collection package entitled, Generic Clearance for Public Participation, Community Engagement, Feedback from Interested and Impacted Groups and Surveys as Part of the Food and Nutrition Service's Planning for, Development and/or Implementation of Regulatory Actions, Semi-Annual Regulatory Agenda, Program Changes, Research Studies, Surveys, Methodologies, Outreach, Training, Guidance and/or Other Projects. This information collection is intended to cover all approaches used, and to be used, by the United States Department of Agriculture's Food and Nutrition Service (FNS) for soliciting detailed stakeholder feedback beyond the use of open-ended questions during FNS listening sessions (which do not require clearance under the Paperwork Reduction Act). This information collection covers the collection of administrative data, records and the use of survey-type questions to solicit detailed information from the full range of FNS stakeholders who may be impacted by FNS regulatory actions, program changes, research studies, outreach, training, guidance or other FNS projects impacting stakeholders (excluding FNS projects covered under any existing OMB-approved information collections).

Presidential Executive Order 14094 of April 6, 2023, in Appendix 1, states "to the extent practicable and consistent with applicable law, regulatory actions should be informed by input from interested or affected communities; State, local, territorial, and Tribal officials and agencies; interested or affected parties in the private sector and other regulated entities; those with expertise in relevant disciplines; and the public as a whole. Opportunities for public participation shall be designed to promote equitable and meaningful participation by a range of interested or affected parties, including underserved

Executive Order 14094 also explicitly directs Federal agencies to inform the development of regulatory agendas and plans, to "endeavor, as practicable and appropriate, to proactively engage interested or affected parties, including members of underserved communities; consumers; workers and labor organizations; program beneficiaries; businesses and regulated entities; those with expertise in relevant disciplines; and other parties that may be interested or affected. These efforts shall incorporate, to the extent consistent with applicable law, best practices for information accessibility and engagement with interested or affected parties, including, as practicable and appropriate, community-based outreach; outreach to organizations that work with interested or affected parties; use of agency field offices; use of alternative platforms and media for engaging the public; and expansion of public capacity for engaging in the rulemaking process."

Furthermore, on July 19, 2023, the Office of Management and Budget (OMB) issued guidance to Federal agencies on "Broadening Public Participation and Community Engagement in the Regulatory Process" (in Appendix 2). The guidance from the Office of Information and Regulatory Affairs (OIRA) discusses how agencies, during the regulatory process, can "promote equitable and meaningful participation by a range of interested or affected parties," including members of underserved communities, as specified in Executive Order 14094, to the extent practicable and consistent with applicable law. The OMB memorandum also establishes guidance for agencies to implement Executive Order 14094's call for proactive engagement to "inform the development of regulatory agendas and plans," with a focus on encouraging early engagement in agency priority-setting. OMB's July 19, 2023, guidance explicitly references generic clearances as a tool that Federal agencies can utilize in

collecting important early input from stakeholders.

This new generic will also support collection of information, as necessary, in the future, for all other existing Presidential Memoranda and Executive Orders which impact clients and customers of the Food and Nutrition Service (FNS); by way of example only, this would include but not be limited to the Executive Order on Further Advancing Racial Equity and Support for Underserved Communities through the Federal Government, Executive Order 14058 of December 13, 2021 (Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government); and evaluation and evidence-building activities pursuant to the Foundations for Evidence-Based Policymaking Act of 2018 (Public Law 115-435) and section 5 of the Presidential Memorandum of January 27, 2021 (Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking).

In summary, this new, and first of its kind for the Food and Nutrition Service, generic information collection, once approved by OMB, will allow FNS to more easily implement E.O. 14094 and OMB's guidance on "Broadening Public Participation and Community Engagement in the Regulatory Process" and all other Executive Orders and Acts impacting FNS and its clients and the public in general, by soliciting survey-type, detailed feedback and existing pertinent administrative data from impacted stakeholders while still maintaining compliance with the Paperwork Reduction Act (PRA) in the most efficient way currently feasible under PRA within its existing constraints.

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

Indicate how, by whom, how frequently, 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 purpose for the new collection of this information is for the Food and Nutrition Service to obtain and factor in public and client feedback and existing administrative data, into the planning, development, and proposed implementation of regulatory actions, semiannual regulatory agendas, program changes, research studies, surveys, methodologies, outreach, training, guidance (in all forms) and other projects to be completed by FNS and/or USDA to address problems or issues being experienced by the agencies, stakeholders, individuals, and groups impacted by the mission and activities of FNS.

The proposed information collection provides a means to garner qualitative and quantitative public and client feedback, stakeholder feedback, feedback from state, local and/or Tribal agencies and implementers, feedback from program participants and impacted parties/individuals, and existing administrative data in an efficient and timely manner. This new FNS-wide generic information collection request currently does not exist and would focus on the following:

• Discussion groups, focus groups, stakeholder meetings, and structured and semistructured interviews that involve other than routine customer feedback and may
include development of standardized questions such as focus group or interview
protocols. These would engage the pubic, impacted individuals, groups and/or
communities, stakeholders, program participants, and state, local and/or Tribal
agencies who would potentially provide valuable input necessary for planning: a)
research studies, including program evaluations such as impact or process evaluations;
b) regulatory actions; c) program changes; d) outreach, promotion activities and/or
training for stakeholders and program participants; e) guidance, technical assistance
documents, questions and answers, to be issued by FNS; and/or f) other necessary
program or policy analyses.

- Surveys requesting feedback from state, local, and Tribal agencies administering FNS programs and program participants or potential participants. These may include one-time surveys on specific topics of immediate need and pulse-type surveys. The pulse-type surveys are intended to provide routine snapshots on key issues of regular interest and to understand current program operations and needs. FNS does not intend to pressure agencies to respond to voluntary surveys. This generic information collection will also be utilized for pre-tests for surveys.
- Ad-hoc collection of extant administrative data from state, local and Tribal agencies that administer FNS programs and/or demonstration projects (including but not limited to the Food Distribution Program on Indian Reservation demonstration projects).
  These would be data that FNS knows are in existence and that state, local, and Tribal agencies must regularly collect to operate FNS programs but do not necessarily report to the Federal level.
- Feedback on data collection instruments for FNS research studies, including experimental data collection instruments and methods. FNS currently lacks a vehicle, beyond study-specific information collection requests, by which data collection instruments can be efficiently cleared for testing by more than nine respondents, limiting both the scope of the feedback we receive to inform final versions of the instruments and the ability to innovate new methods of data collection that may reduce respondent burden while generating more accurate data. This generic would address that need.

FNS does not intend to pressure agencies or other interested parties or individuals to respond when soliciting their voluntary input.

Information gathered could potentially yield qualitative and/or quantitative information and, when appropriate, may be shared outside the Agency (along with the context and parameters for the subject information collection, and excluding personally identifiable information). Data gathered through this collection will be combined with information from many other sources and other inputs to inform program and policy decision-making.

This collection allows for ongoing, two-way collaborative and actionable communications between the Agency and its state, local and/or Tribal partners, program participants, potential participants, impacted individuals, groups and communities, and stakeholders. It also allows feedback to contribute directly to the improvement and planning of methodologies, research studies, program changes, regulatory activities, guidance, outreach and training activities. As individual collections occur under this generic umbrella, consideration will be given to the appropriate data sharing, equity issues and transparency per collection.

The methods and frequency for collecting stakeholder feedback and data will vary depending on the individual situation. For example, in order to obtain input for future regulations, FNS personnel could reach out to impacted stakeholders via email and/or conversations in order to schedule discussions with impacted stakeholders and could potentially use survey type questions prior to, during and/or in follow-up to those discussions, in order to obtain detailed input from impacted stakeholders.

When appropriate, FNS may also use intermediaries (e.g., associations, etc.) who have regular connections with key stakeholder groups to support participation in surveys and focus groups, including distribution of surveys, sharing opportunities for focus groups, and creating

spaces (virtual and in-person) for the information to be shared and collected. Such intermediaries could assist with more rapid and ongoing feedback collection as needed.

The information to be collected could focus on a variety of Food and Nutrition Service (FNS) programs, or portions thereof, including but not limited to the National School Lunch Program (NSLP), School Breakfast Program (SBP), Fresh Fruit and Vegetable Program (FFVP), Summer Food Service Program (SFSP), Child and Adult Care Food Program (CACFP), Food Distribution Program on Indian Reservations (FDPIR), Commodity Supplemental Food Program (CSFP), The Emergency Food Assistance Program (TEFAP), and the new Summer Electronic Benefit Transfer Program, other child nutrition and food distribution activities, the Patrick Leahy Farm to School program, the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the WIC Farmers Market Nutrition Program (FMNP), the Senior Farmers Market Nutrition Program (SFMNP), nutrition and policy promotion, and any associated challenges in implementing programs or subsets of programs.

#### 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.

FNS intends to collect feedback from impacted individuals, groups and stakeholders, and existing data using the most efficient, effective, and least burdensome approach(es) for each collection and will take into account information technology when choosing these approaches. FNS anticipates that the majority of stakeholder feedback will be obtained through virtual meetings, conference calls, email, electronic surveys, and/or site visits; it is

not anticipated that, in general, stakeholders will need to travel to meet with FNS in person in order to provide input. FNS is fortunate to have a significant number of diverse stakeholders to communicate with in seeking feedback, undertaking outreach and encouraging stakeholder-initiated engagement best-suited to the affected Programs and activities. So, for example, FNS may request volunteers for a focus group of all states and/or engage in a number of informal discussions with a smaller number of stakeholders with substantive experience and experience on a particular topic. However, when in-person national conferences are scheduled for other purposes, stakeholder input may also be obtained in-person when national conferences provide ready availability for face-to-face discussions.

FNS also intends to take into account the unique demands of the range of stakeholders with whom FNS interacts, including individuals who do not speak English as their native language and individuals with limited time to provide information due to their working hours. As appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden. FNS makes every effort to comply with the E-Government Act, 2002. FNS also intends to simplify each request for information and the submission process, as appropriate, while ensuring the utility of the information to be collected given its purpose.

#### 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 will avoid duplication of efforts when soliciting and collecting new information and existing data from agencies never before shared or received. FNS has no reason to collect any information or data which it already possesses, and it would be a resource drain on the agency to do so. In terms of surveys associated with research studies, the Agency normally

reviews information acquired through prior collections, peer reviewed literature and other sources, prior to initiating new surveys. In addition, FNS is seeking OMB approval of this new generic information collection, in part, due to *new* proposed and/or interim final regulations which FNS intends to publish in the future and the desire and need to collect stakeholder input in situations where targeted feedback is needed from stakeholders in response to specific questions to be posed for well-defined areas and topics as appropriate. Given the number of regulations which FNS intends to publish, FNS does not have the resources sufficient to duplicate any requests for information and will avoid doing so.

## A5. Impacts on small businesses or other small entities. If the collection of information impacts small businesses or other small entities (Item 5 of

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.

The agency does not intend to collect information which will have a negative impact on small businesses or other small entities. However, for any information collection to be pursued under this generic clearance, if FNS determines there will be an impact on small entities, FNS will discuss with OIRA the methods that will/should be used to minimize any burden in specific case-by-case situations.

#### 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.

The proposed feedback and data from stakeholders, impacted individuals and groups, moves beyond listening sessions and is critical in the planning, development and/or implementation of regulatory actions, the semi-annual regulatory agenda, program changes, research studies, surveys, methodologies, outreach, training, guidance, and/or other projects. Failure to collect the proposed detailed feedback, data and information would potentially reduce the effectiveness of the projects and Agency actions, e.g., the regulations, research

studies, surveys, methodologies, etc.) for which the feedback and data will be used. Failure to collect stakeholder feedback could reduce the intended benefits and effectiveness of the FNS projects and actions. Without this information, FNS cannot obtain and use detailed input from stakeholders whose opinions are critical to the development process of Agency actions. Without the collection of this information, FNS would not be fully implementing E.O. 14094 or OMB's latest guidance on public engagement in the regulatory process in the same manner that FNS could with the proposed collection. Without this information collection, FNS would need to rely solely on listening sessions for FNS stakeholder engagement (beyond routine customer feedback), or limit engagement to nine or fewer entities, unless ICRs were developed and approved for each stakeholder engagement process. Developing ICRs for each stakeholder engagement would be unrealistic and unwieldly given the length of the Paperwork Reduction Act (PRA) standard approval process and required publication of both 60-day and 30-day FR Notices per collection.

#### 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.

If any such special circumstances exist, FNS will discuss them with OIRA when each specific collection occurs under this generic information collection request.

## 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 published a 60-day Federal Register (FR) Notice (included in Appendix 3) soliciting public comment on May 8, 2023, in Volume 88 of the FR beginning on page 29622. The FR Notice citation is 88 FR 29622. FNS received one comment (included in Appendix 4) from the Texas Department of Agriculture (TDA). The comment reads as follows:

"TDA recommends United States of Agriculture (USDA) to share its methods on how it will establish these focus groups. Also, USDA should consider if interviews and feedback opportunities will be inperson or virtual. Additional guidance like these will help states when allocating these potential costs in their budgets. The memorandum indicates that Food and Nutrition Services (FNS) is referring to data already readily available but not collected regularly. TDA recommends USDA to clarify its intent on the rationale behind identifying specific groups in a new reporting requirement.

TDA supports USDA's efforts on soliciting stakeholder feedback

through additional avenues. TDA also recommends USDA to publicly share information collected from such efforts, so that the overall population may understand how interests are represented by a variety of stakeholders."

In response to this comment, additional information was included in the response to question #3 in this supporting statement. FNS also clarified in this supporting statement that the agency anticipates that the majority of stakeholder feedback will be obtained through virtual meetings or conference calls and/or via email; stakeholder input may also be obtained in-person when in-person national conferences are scheduled by associations and other groups for other purposes, and when they provide ready availability for face-to-face discussions.

If FNS makes a request to states to share with FNS existing state administrative data, it will likely cover a limited timeframe, and FNS does not currently anticipate that such a request would become a formal reporting requirement. FNS will provide additional context whenever a request to share existing data is made.

FNS intends to publicly share summaries of the stakeholder feedback to be collected in the background sections of both proposed and final regulations on which stakeholder input was sought. For guidance documents on which stakeholder feedback is sought, FNS will consider ways to make the data collected and the impact on the final guidance more transparent. For research studies, stakeholder feedback that impacted the methods used or scope of the study will be summarized and discussed as appropriate in the methods section of the final report. Stakeholder feedback on research findings will be incorporated in project reports (e.g. States will have the opportunity to review their case study findings.) Research findings are publicly posted to the FNS website at <a href="https://www.fns.usda.gov/research-analysis">https://www.fns.usda.gov/research-analysis</a> in a format that is searchable by keyword and date. For outreach, promotion and training, FNS does not anticipate sharing the information collected publicly, but could make the information

available upon request to partnering organizations coordinating with FNS on outreach and promotion efforts. As appropriate, given the unique circumstances of each data collection, FNS will strive for transparency in the form of aggregate responses for the individuals who respond to surveys and information collection requests.

In addition to seeking public input through the 60-day Federal Register Notice, FNS also sought input from three external consultants/stakeholders and two of the three provided comments to FNS. One of the stakeholders who works for a national association shared the following comments after reading the draft version of Supporting Statement A:

"I've read this through twice now and honestly, it's incredibly thorough and I believe very thoughtful it its proposed approaches. No comments or additions from me but I very much appreciate the opportunity to review and applaud FNS on embarking on this!"

The second stakeholder works with state and local agencies and provided positive comments and suggestions in the margins of draft Supporting Statement A, as well as the following general comments in the transmittal email:

- We are in strong support of FNS's request for to be able to collect rapid and ongoing responses from stakeholders. We believe this opportunity would allow FNS to receive critical feedback under tight timelines from state agency administrators, customers, and others before decisions are made that will impact them.
- We believe intermediaries to support participation in surveys and focus groups will be essential to the success of this new request, including distribution of surveys, sharing opportunities for focus groups, and creating spaces (virtual and in-person) for the information to be shared and collected.
- I can't tell if responses will ever be required, but I'd caution FNS from requiring or putting extreme pressure on states and others to respond especially if there are multiple

- information requests at one time. It is important to acknowledge competing priorities for states and how these information requests will contribute to their capacity levels.
- Section A9 does talk about the ability to provide gifts for respondents, but we'd like to
  suggest that FNS also consider: 1) establishing formal partnerships with intermediaries
  who have regular connections with key stakeholder groups to help for more rapid and ongoing feedback collection as needed, and 2) establishing a requirement to compensate
  clients of the programs for completing information requests.

All of the aforementioned helpful input was taken into account in revising and updating Supporting Statement A. The responses to questions 2, 8 and 10 were revised or expanded in order to incorporate the aforementioned input, for which FNS is grateful.

#### 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.

Stakeholder discussion participants, selected interview participants, or survey recipients could potentially receive a small token of appreciation; non-store gift card (e.g., American Express, MasterCard or Discover); or a stipend, as appropriate, depending on each situation and specific set of information to be collected under this generic clearance. If and when applicable, amounts and justifications would be determined on an individual project basis, and this information would be included in the memo to be provided to OMB for each information collection to be pursued under this generic clearance.

#### 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.

FNS and its contractors will follow all procedures for assuring and maintaining privacy consistent with the Privacy Act during all stages of data collection. If any contact information

is gathered from State administrators pertaining to local-level officials, then it will be for research purposes only and will be kept private to the full extent allowed by law. State administrators providing this information will be assured that respondent contact information (e.g., name, work phone number, and work email) will remain private and will only be used for the purposes of contacting local staff to administer surveys. There may be potential situations where respondents can choose to not disclose their information.

Furthermore, regarding FNS studies/reports, FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19078-19080, that discusses the terms of protections that will be provided to respondents. FNS will comply with the requirements of the Privacy Act of 1974.

#### 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.

If FNS anticipates any questions of a sensitive nature, those will be highlighted for OIRA when FNS submits a memo to OIRA for each tailored information collection to be pursued under this generic ICR.

#### 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 annual burden hours requested of 43,360 are based on the number of collections we expect to conduct annually over the requested period for this clearance.

Type of Collection	No. of Annual Respondents	Total Annual Responses	Total Annual Burden Hours
Surveys/Pulse surveys	37,180	93,425	27,110
Focus Groups/Discussion Groups/Stakeholder Meetings/Interviews	2,500	4,500	5,000
Administrative data collection and associated requests	895	2,430	11,250
Total	40,575	100,355	43,360

## **Annual Reporting Burden Estimates**

Affected Public: Individuals and Households, Businesses and Organizations, State, Local or Tribal Government.

Estimated Number of Annual Respondents: 40,575

Estimated Number of Annual Responses per Respondent: Ranges from 1 response to 10 responses depending on category of respondent.

Estimated Annual responses: 100,355

*Estimated time per response:* Ranges from 10 minutes per response to 10 hours per response depending on type of collection (that is, survey, discussion group, or administrative data collection) and the nature of the request.

Estimated Annual Burden hours: 43,360

In summary, the total estimated annual burden is 43,360 hours and 100,355 responses. Thus, we are requesting 130,080 hours for our three-year burden estimate and 301,065 total responses for the three-year approval period. Current estimates are based on both historical numbers of respondents from past projects as well as estimates for projects to be conducted in the next three years.

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

The respondents providing input will vary widely and depend on the specific request for feedback and from whom that feedback is being requested. As a surrogate figure to utilize for estimating annualized cost to respondents, FNS is using the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational and Wage Statistics, Occupational Group NAICS 999200 - State Government, excluding schools and hospitals mean of 'all occupations' (https://www.bls.gov/oes/current/naics4\_999200.htm). The hourly mean wage for functions performed by state program staff is estimated at \$31.28 per staff hour. With a burden of 43,360 at \$31.28 per hour, the base annual respondent cost is estimated at \$1,356,300. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$447,579. Thus, the total annual respondent cost is estimated to be approximately \$1,803,880.

#### 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 annualized cost to the Federal government is \$23,533.

FNS estimates that Federal employees from seven FNS program offices and OPS divisions will spend approximately 16 hours each completing this collection three times a year. Using the hourly wage rate of \$52.66 for a GS-12, step 6 Federal employee from the 2023 Washington, DC locality pay table, the estimated costs equal \$17,693.76. With the addition of a 33% fringe benefit cost (\$5,838.94), the total estimate cost of this data collection is \$23,533.

#### 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 a new information collection request and will add 43,360 burden hours and 100,355 total annual responses to OMB's inventory.

#### 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.

Such plans will be dealt with on a case-by-case depending on the project utilizing this generic information collection and will be shared with OIRA on a case-by-case basis.

#### 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.

If this ever becomes applicable, this will be dealt with case-by-case and information will be shared with OIRA, on a case-by-case basis, depending on the individual projects utilizing this generic information collection.

## 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."

Not applicable to this information collection.