

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0336:

Disaster Supplemental Nutrition Assistance Program (D-SNAP)

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Jenna Mayer

Program Analyst

jenna.mayer@usda.gov

Supplemental Nutrition Assistance Program

Program Development Division, Modernization & Integration Branch

USDA Food and Nutrition Service

1320 Braddock Place

Alexandria, VA 22314

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Appendix D: D-SNAP Example Press Release

Appendix E: D-SNAP Sample Application

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Appendix H: D-SNAP Guidance

Appendix I: 65 FR 17251 - Privacy Act: Proposed New System of Records

Appendix J: 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 a revision of a currently approved information collection. Pursuant to Section 5(h) of the Food and Nutrition Act of 2008, 7 U.S.C. 2014(h), and 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 similar, yet 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 of benefits to eligible households.

Per D-SNAP Guidance (Appendix H), States may only request to operate D-SNAP in areas that have received a Presidential Major Disaster Declaration with authorization for Individual Assistance, also known as an IA declaration. For a Major Disaster Declaration, the Federal Emergency Management Agency (FEMA) Regional Office deploys staff to conduct joint Preliminary Damage Assessments in conjunction with State, local, Tribal Nation, and/or territory representatives. The Governor or Tribal Executive then submits a declaration request. FEMA submits a recommendation to the President regarding the declaration request. Final determinations are at the sole discretion of the President.

In an effort to improve D-SNAP Guidance following the COVID-19 public health emergency, FNS engaged in listening sessions with State agencies, community partners, and EBT vendors to solicit feedback on all aspects of D-SNAP operations and as a result have made adjustments to our

burden estimates.

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 D-SNAP waiver requests, State agencies outline the impact of the disaster on households and/or businesses, the proposed procedures for conducting D-SNAP, designate the areas where they wish to operate, and provide estimates of benefit issuance. FNS uses this information to evaluate the State agency's plan for operation to ensure compliance with the Food and Nutrition Act, the Stafford Act, SNAP regulations, and D-SNAP guidance.

Along with the waiver request to operate D-SNAP in areas that have received an IA declaration, FNS asks that the State agency submit a draft press release (Appendix D) and a sample of their D-SNAP application (Appendix E) for households applying for assistance. FNS expects State agencies to issue a press release at least several days before the application period for D-SNAP opens to the public to publicize the application period to households impacted by the disaster that may need assistance. Per D-SNAP Guidance, the press release should include information about the operation such as the counties and/or ZIP codes approved for assistance, application dates, application sites and hours of operation, and other information that potential applicants may need. The sample application should include information about the head of household, the impact of the disaster on the household, household members, household income and resources, a penalty warning, and USDA's nondiscrimination statement. This information is critical to ensure that the State agency is prepared to operate an effective and efficient D-SNAP.

Once FNS approves an initial waiver request to operate D-SNAP, State agencies will submit any subsequent request to modify or extend operations to eligible areas to FNS for approval. These

modification or extension requests are typically used when a State agency needs to lengthen their D-SNAP operation or expand the areas that it serves based on the needs of the population impacted by the disaster and/or the addition of areas to a Major Disaster Declaration. These requests are submitted electronically through the Waiver Information Management System (WIMS).

During the application period for a D-SNAP operation, State agencies submit daily reports to FNS. Daily reports allow FNS to monitor State agency capacity and benefit issuance to maintain a high level of customer service and integrity in D-SNAP operations. The daily reporting template (Appendix F) provided by FNS includes data such as the number of applications taken, the number of applications approved and denied, the amount of D-SNAP benefits issued, the number of pending applications, the number of supplements approved, and the amount of supplements issued. For operations containing a virtual component, the daily report also captures telephonic operation and card issuance data. State agencies submit daily reports electronically through WIMS.

Six months after the closing date of a State agency's D-SNAP application period, State agencies will submit a post-disaster review report to FNS. The post-disaster review report ensures that FNS understands all aspects of the D-SNAP operation and can identify opportunities for improvement. The post-disaster review report template (Appendix G) asks that State agencies summarize the impact of the disaster, detail the D-SNAP operation and procedures utilized, provide case review results, and reflect on changes that could be considered in the future. State agencies submit the post-disaster review report electronically through WIMS.

Using clearly defined criteria, FNS provides a template for State agencies submitting their D-SNAP waiver request (Appendix C), an example of a draft press release (Appendix D), a sample application (Appendix E), a template for the daily reports (Appendix F), and a template for the post-disaster review report (Appendix G). These items are submitted electronically to FNS through WIMS.

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: 06/30/2027).

The information collected by FNS to conduct D-SNAP is done so via reporting by State agencies that operate D-SNAP. The collection of this information is required in order for a State agency to receive an approval letter from FNS to operate D-SNAP in their jurisdiction. The information collected is not shared outside FNS. While the collection is being revised from the previous approval to include additional items, we are doing so to more accurately and concisely account for the State agency burden of requesting, operating, and reporting on D-SNAP and ensure that FNS is in full compliance with the Paperwork Reduction Act. The additional burden captured by this revision can be accounted for in the draft press release, sample application, daily reports, and the post-disaster review report.

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: 09/30/2026).

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 and

reports to FNS via WIMS at <https://www.wims.fns.usda.gov>; 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. There is no similar information available elsewhere. FNS is solely responsible for authorizing State agencies to operate D-SNAP. FNS monitors State performance to ensure that the program is being efficiently and economically operated.

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. The information for a waiver request (including the draft press release and sample application), modification, and extension is only collected and required to obtain authorization to issue benefits if a State agency wishes to operate D-SNAP in areas that have received

an IA declaration. 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.

State agencies collect information for the daily report and submit the report to FNS once per day for a D-SNAP operation until all applications have been processed. Daily reports ensure that FNS can monitor State agency capacity and benefit issuance to maintain a high level of customer service and integrity in D-SNAP operations. Without this information, FNS would not know about issues with State agency administration of D-SNAP until other reports are submitted several months after the operation or from press reports.

State agencies collect information for the post-disaster review report once for each D-SNAP operated and submit the report to FNS six months after the conclusion of the application period. The post-disaster review report provides FNS with a summary of the disaster, the State agency's response to the disaster via D-SNAP, case review results, and a space to reflect on future adjustments and feedback. This report ensures that FNS and the State agency are continually improving the efficiency and effectiveness of D-SNAP to better serve impacted households going forward.

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.

The 60-day notice for this information collection published in the Federal Register on Thursday, May 29, 2025, and can be found on page 22684 Vol. 90, No. 102. FNS received one relevant public comment during the 60-day notice period. The comment expressed support for the burden estimates provided in the notice.

FNS engaged in stakeholder consultation with three State agency representatives: Marisa V. from the New Mexico Health Care Authority, Michelle J. from the Tennessee Department of Human Services, and Tiffany W. from the Iowa Department of Health and Human Services. As a result of feedback from these State agency representatives, we adjusted the estimated number of hours per response for submission of an initial D-SNAP request from 10 hours to 15 hours. All three of the State agencies consulted suggested that submission of the initial request takes longer than the previous

estimate of 10 hours. Overall, the State agencies consulted concurred with the burden estimates from the 60-day notice for all of the other activities in this information collection.

A9. Explain any decisions to provide any payment or gift to respondents.

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents under this collection.

A10. Assurances of confidentiality provided to respondents.

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Department complies with the Privacy Act of 1974. 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 (Appendix I). It does not cover SNAP recipients or State agencies. The SORN covers contractors and other business entities doing business with FNS.

Deea Coleman, USDA FNS Privacy Officer, reviewed and approved this submission on August 28, 2025.

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. Deea Coleman, USDA FNS Privacy Officer, reviewed and approved this submission on August 28, 2025.

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 J). A summary of the burden appears below.

Reporting Burden

FNS estimates nine (9) State agencies will submit two D-SNAP requests each year, for a total annual response of 18 requests at 15 hours per response. FNS estimates the total burden for this provision to be 270 hours (9 State agencies x 2 requests annually x 15 hours per request = 270 hours). This burden estimate represents an increase of 170 hours from the previous submission for the activity. This increase is due to the higher annual average of weather/climate disaster events with losses exceeding \$1 billion. The 1980–2024 annual average is 9.0 events (CPI-adjusted) and the annual average for the most recent 5 years (2020–2024) is 23.0 events (CPI-adjusted).¹ This leads to a corresponding increase in the number of D-SNAP waivers requested annually. Additionally, we increased the burden estimate for completing the initial request from 10 hours to 15 hours as a result of feedback from stakeholder consultation.

¹ <https://www.ncei.noaa.gov/access/billions/>

Out of the nine (9) State agencies that submit two D-SNAP requests each year, FNS estimates an average of four (4) State agencies will submit subsequent requests to modify or expand those already approved D-SNAPs. The Department is not double counting these four (4) 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 four (4) State agencies will submit two (2) requests each year, for a total annual response of eight (8) requests at three (3) hours per response. FNS estimates the total burden for this provision to be 24 hours (4 State agencies x 2 requests annually x 3 hours per request = 24 hours). This burden estimate represents an increase of twenty-one (21) 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.

Along with their D-SNAP request, FNS asks that each of these nine (9) State agencies submit a sample application and a draft press release. FNS estimates that it takes each of the nine (9) State agencies 1 hour per response for a sample application. FNS estimates the total burden for this provision to be 18 hours (9 State agencies x 2 requests annually x 1 hour per submission = 18 hours). This burden is being added to more accurately capture the burden on State agencies operating D-SNAP. FNS estimates that it takes each of the nine (9) State agencies 2 hours per response for a draft press release. FNS estimates the total burden for this provision to be 36 hours (9 State agencies x 2 requests annually x 2 hours per submission = 36 hours). This burden is being added to more accurately capture the burden on State agencies operating D-SNAP.

Beginning on the first day of the application period for a D-SNAP operation, each of the nine (9) State agencies will submit a daily report to FNS until all applications have been processed. FNS estimates that it takes each of the nine (9) State agencies 2 hours per response and each State agency will submit this report for approximately 20 days. FNS estimates the total burden for this provision to

be 360 hours (9 State agencies x 20 submissions annually x 2 hours per submission = 360 hours). This burden is being added to more accurately capture the burden on State agencies operating D-SNAP.

Six months after the conclusion of a D-SNAP operation, each of the nine (9) State agencies will submit a post-disaster review report. FNS estimates that it takes each of the nine (9) State agencies 10 hours per post-disaster review report. FNS estimates the total burden for this provision to be 180 hours (9 State agencies x 2 submissions annually x 10 hours per submission = 180 hours). This burden is being added to more accurately capture the burden on State agencies operating D-SNAP.

Respondent/ Activity	Citation	Number of respondents	Responses annually per respondent	Total annual responses	Number of burden hours per response	Estimated total burden hours
State Agency – Submission of D- SNAP request	Sec 5(h)(1) the Food and Nutrition Act of 2008	9	2	18	15	270
State Agency – Submission of D- SNAP modification or expansion request	Sec 5(h)(1) the Food and Nutrition Act of 2008	4	2	8	3	24
State Agency – Submission of sample application	Sec 5(h)(1) the Food and Nutrition Act of 2008	9	2	18	1	18
State Agency – Submission draft press release	Sec 5(h)(1) the Food and Nutrition Act of 2008	9	2	18	2	36
State Agency – Submission of daily reports	Sec 5(h)(1) the Food and Nutrition Act of 2008	9	20	180	2	360
State Agency – Submission of post- disaster review report	Sec 5(h)(1) the Food and Nutrition Act of 2008	9	2	18	10	180
Total Reporting Burden		9	30	270	33	888

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: 06/30/2027). 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 estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2024 National Occupational and Wage Statistics, Occupational Group (11-9151)². The hourly mean wage for functions performed by Social and Community Service Managers is estimated at \$42.39 per staff hour. The estimated annualized, fully loaded (x1.33) cost to respondents after 50% percent reimbursement from the Federal government is \$25,041.60. See table below for details:

Activity	Hourly wage rate	Annual burden hours	Cost (US\$)
Submission of D-SNAP requests by State agency managers	\$28.20	270	\$7,614.00** Expression is faulty **
Submission of D-SNAP modification or expansion request by State agency managers	\$28.20	24	\$676.80** Expression is faulty **
Submission of D-SNAP sample application by State agency managers	\$28.20	18	\$507.60

²<https://data.bls.gov/oes/#/industry/99920>

Submission of D-SNAP draft press release by State agency managers	\$28.20	36	\$1,015.20
Submission of D-SNAP daily reports by State agency managers	\$28.20	360	\$10,152.00
Submission of D-SNAP post-disaster review report by State agency managers	\$28.20	180	\$5,076.00
Total Annual Cost			0\$25,041.60

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 operations, 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.

FNS estimates that it takes a SNAP Division Director, General Schedule (GS) grade 15, step 1 (\$80.31/hour), approximately 10 hours to analyze and evaluate data received from this information collection. FNS estimates that it takes a SNAP Branch Chief, GS grade 14 step 1 (\$68.27/hour) approximately 20 hours to analyze and evaluate data received from this information collection. FNS estimates it takes a SNAP program analyst, GS grade 13 step 1 (\$57.78/hour), approximately 100 hours

to analyze and evaluate data received from this information collection. FNS used the hourly wage rates for the locality pay area of Washington-Baltimore-Arlington. FNS estimates the fully loaded (x1.33) cost for federal workers is \$14,796.74.³ The Federal share of State costs is \$25,041.60. The Federal cost also includes the cost associated with the preparation of this information collection package (20 hours). Thus, the total cost for the Federal government for this information collection is \$41,375.34. The calculations for this cost are described in the table below:

<i>Review of State agency D-SNAP information</i>	<i>Estimated Total Annual Burden Hours</i>	<i>Estimated Hourly Wage Rate</i>	<i>Cost (US\$) (approx.)</i>
Program Analyst (GS-13/1)	140	\$76.85	** Expression is faulty **\$ 10,759.00
Branch Chief (GS-14/1)	** Expression is faulty ** 28	\$90.80	** Expression is faulty **\$ 2,542.40
Division Director (GS-15/1)	** Expression is faulty ** 14	\$106.81	** Expression is faulty **\$ 1,495.34
Costs for Federal workers			0\$14,796.74
Preparation of IC request (20 hours by Program Analyst GS-13/1)			\$1,537.00
Add 50% Federal Share of State Cost			\$25,041.60
Total Federal cost (Federal workers cost + 50% State Cost)			\$41,375.34

A15. Explanation of program changes or adjustments.

This is a revision of a currently approved information collection. The number of State agencies expected to operate D-SNAP annually increased from five (5) to nine (9). The reporting hours in this submission will increase by 776 burden hours due to an increase in program participation (adjustment), a revision of the estimated time to complete the initial request, and the inclusion of additional burden activities such as the sample application, draft press release, daily reports, and post-disaster review report, that more accurately reflect the burden on State agencies of operating D-SNAP.

³ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf

A16. Plans for tabulation, and publication and project time schedule.

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 83-1" Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.