

**Supporting Statement for Paperwork Reduction Act Submission**

**Food Programs Reporting System (FPRS)**

**OMB CLEARANCE NUMBER: 0584-NEW**

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**Attachments**

- Attachment 1: Worksheets (FNS approved forms on CD)
- Attachment 2: Privacy Impact Assessment
- Attachment 3: Burden Chart

## JUSTIFICATION

**1.) Explain the 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.**

FPRS facilitates data gathering for the reporting of data for the Special Supplemental Nutrition Program (SNAP) and the Special Nutrition Programs. FPRS is the primary collection point for program performance statistics and financial data from State agencies (SA), Indian Tribal Organizations (ITO), and U.S. Territories participating in the nutrition assistance programs. This information collection pertains to 18 FNS collections currently approved by OMB and 2 new forms not previously approved by OMB. The 2 new forms are being submitted as changes due to potential violation of the PRA. The reporting burdens for these collections will merge with FPRS once approved by OMB. Any recordkeeping burdens associated with the existing collections will remain with its approved OMB control number. Each program has multiple information collection packages and they are listed here by program:

| <b>Currently OMB approved information collection packages</b> |                       |                 |
|---|-----------------------|-----------------|
| OMB Control Number  | Worksheet/Form number | Expiration Date |
| <b>Child Nutrition Program</b>                                |                       |                 |
| 0584-0002   | FNS-10                | 10/31/2015      |
| 0584-0075   | FNS-13                | 2/28/2014       |
| 0584-0280*  | FNS-418               | 3/31/2016       |
| 0584-0055   | FNS-44                | 09/30/2016      |
| 0584-0067   | FNS-777               | 5/31/2016       |
| 0348-0061   | SF-425                | 2/28/2015       |
| <b>Special Nutrition Assistance Program</b>                   |                       |                 |
| 0584-0025   | FNS-101               | 8/31/2015       |
| 0584-0069   | FNS-209               | 9/30/2015       |
| 0584-0083   | FNS-366A & FNS-366B   | 4/30/2017       |
| 0584-0081   | FNS-388 & FNS-388A    | 3/31/2017       |

|  |   |            |
|--|---|------------|
| 0584-NEW   | FNS-778 & FNS-778A                      |            |
| 0584-0339  | FNS-583                                 | 6/30/2014  |
| 0584-0037  | FNS-292A&B                              | 7/31/2014  |
| 0584-0080  | FNS-46                                  | 3/31/2014  |
| 0584-0542  | FNS-759                                 | 8/31/2016  |
| <b>Food Distribution Programs</b>  |   |            |
| 0584-0293  | FNS-667, FNS-152, FNS-153,<br>& FNS-667 | 12/31/2014 |
| 0584-0025  | FNS-191 & FNS-101                       | 8/31/2015  |
| 0348-0061  | SF-425                                  | 2/28/2015  |
| <b>Special Supplemental Food Program for Women, Infants and Children (WIC)</b> |   |            |
| 0584-0447  | FNS-683 & FNS-203                       | 9/30/2014  |
| 0584-0541  | FNS-683A                                | 5/31/2016  |
| 0584-0431  | FNS-648                                 | 4/30/2014  |
| 0584-0045  | FNS-798 & FNS-798A                      | 11/30/2014 |
| 0348-0061  | SF-425                                  | 2/28/2015  |
| <b>Grants Management</b>   |   |            |
| 0348-0061  | SF-425                                  | 2/28/2015  |
|  |   |            |

\*Currently at OMB under review.

Note that the FPRS system also includes form FNS-674 (OMB Control Number 0584-0532; Expiration date 1/31/15) which is an FNS User Access form, used for all FNS systems. Screenshots are included of this form, but burden for this form will remain under the existing collection as the form is not specific to FPRS.

**2.) Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Using the FNS forms/worksheets, State agencies, Indian Tribal Organizations, and local agencies that enter into agreements with the Federal government use FPRS to submit data to FNS electronically. The data is gathered at various times, ranging from monthly, quarterly, annual or final submissions. The primary use for this information is regulatory compliance. The information may also be used by FNS to conduct program evaluation, planning and audits, future funding, research, and general statistics. For details on the use of each form, please see attachment "FPRS Forms Purpose."

**3.) 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 is committed to complying with the E-Government Act 2002, by providing electronic submissions of information in lieu of paper whenever possible. FNS encourages its State agency partners to offer electronic submission to local agencies whenever it is feasible. FNS estimates that 100% of the State agencies will respond electronically to this data collection using Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>.

**4.) Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely administers the school meal programs, monitors issuance of SNAP and WIC benefits. Each nutrition assistance program has distinct reporting requirements that are collected electronically through FPRS.

**5.) If the collection of information impacts small business or other small entities, describe any methods used to minimize burden.**

There will be no small entities involved with this data collection.

**6.) 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.**

FNS will be unable to meet its legislative and regulatory reporting requirements for the affected programs.

**7.) Explain any special circumstance that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**

| <b>Current OMB Control Number</b> | <b>Program</b>                       | <b>Worksheet Number and Title</b>                     | <b>Reason for requiring respondents to report information to the agency more often than quarterly</b>   |
|-----------------------------------|--------------------------------------|---|---|
| 0584-0002                         | Child Nutrition Program              | FNS-10<br>Report of School Program Operations         | Per the regulation, States shall not receive Program funds to operate for any month for which the final report is not submitted with the time limit (90 days following the last day of the month covered by the report).  |
| 0584-0078                         | Child Nutrition Program              | FNS-44<br>Report of Child and Adult Care Food Program | Per the regulation, States shall not receive Program funds to operate for any month for which the final report is not submitted with the time limit (90 days following the last day of the month covered by the report).  |
| 0584-0081                         | Special Nutrition Assistance Program | FNS-388<br>State Issuance and Participation Estimates | Part 274.4(b)(4) of the Supplemental Nutrition Assistance Program (SNAP) regulations require State agencies to submit on a monthly basis. Timely State monthly issuance estimates are necessary for FNS to ensure that it remains with the appropriation and will have a direct effect upon the manner in which allotments would be reduced when necessary. |
| 0584-0080                         | Special Nutrition Assistance Program | FNS-46<br>Issuance Reconciliation Report              | Section 7(d) of the Food and Nutrition Act of 2008, as amended, (the Act) (7 U.S.C. 2016(d)) and Regulations at 7 CFR 274.4(a) and 274.4(b) (2), require State agencies to report on their SNAP benefit issuance operations not less than   |

|           |   |  |  |
|-----------|---|--|--|
|           |   |  | monthly, through a reconciliation process and to report to FNS using Form FNS-46, Issuance Reconciliation Report. This monthly report is used to account for benefits issued during a report month for each issuance reporting point, and to document the reconciliation process by which States compare the total issuance, returns, and unauthorized issuance amounts resulting in the net Federal obligation. |
| 0584-0293 | Food Distribution Program   | FNS-152<br>Monthly Distribution of Donated Foods to Family Units                           | Form is collected electronically monthly to ensure efficient management of the program. Timely ordering, receipts, inventory control, and accounting of commodities and funds are necessary to ensure the programs continue to operate and the funds are spent during the appropriate time periods.  |
| 0584-0293 | Food Distribution Program   | FNS-153<br>Monthly Report of the CSFP and Quarterly Administrative Financial Status Report | Form is collected electronically monthly to ensure efficient management of the program. Timely ordering, receipts, inventory control, and accounting of commodities and funds are necessary to ensure the programs continue to operate and the funds are spent during the appropriate time periods.  |
| 0584-0045 | Special Supplemental Food Program for Women, Infants and Children (WIC) | FNS-798<br>WIC Financial Management and Participation Report                               | Monthly reporting is critical for monitoring each State agency's expenditures to ensure it does not overspend its authorized grant, which would create a financial burden for the State. Costs incurred by a State agency in excess of its grant must be paid by the State.  |

- **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 support by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**8.) If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, 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.**

A 60day Notice was published in the *Federal Register* on April 5, 2013, page 20612, Vol. 78, No. 66. No comments were received.

**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 form, and on the data elements to be recorded, disclosed, or reported.**

Regional, State, and local public and private organizations involved in various areas of regularly have an opportunity to raise concerns at annual meetings.

**9.) Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.**

No payment or gift will be offered to respondents.

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

The Department will comply with the Privacy Act of 1974. No individual or household data is collected nor maintained in this system. State Agencies are assigned codes by FNS as an identifier for States only no personal information from individuals. The data will be collected in aggregate form and respondents will not be identified individually.

A Privacy Impact Assessment was conducted in June 2007 on the FPRS (attachment) which determine FNS does not need to publish a SORN.

**11.) Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No sensitive questions will be asked in this data collection.

**12.) Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden the 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.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The requested burden hours associated with this collection and the cost to respondents, are shown in the attached burden chart. Time estimates include the time needed to look up data or copy recorded information and submit it to FNS. There is no recordkeeping burden associated with the new data collection. Once these reporting burden hours have been approved by OMB, the agency will discontinue those information collections that would be considered duplicative in nature. However, there is recordkeeping involved with many of the existing FNS forms/worksheets identified in this request. Any recordkeeping burden hours will remain with those existing collections. Lastly, recordkeeping for the SF 425 will be contained in OMB Control # 0584-0512, expiration date: 1/31/2016.

**13.) Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 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/maintenance costs associated with this information collection.

**14.) Provide estimates of annualized costs to the Federal government. Also, 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.**

It is estimated that the annualized cost of the FPRS system to the Federal government is \$9,222,126.51. This includes contract cost of \$2,334,991 which includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items.

This information collection also assumes that a total of 20 hours of Federal employee time: for labor, analyzing, evaluating, summarizing and reporting on this information collected: GS-14, step 5 Branch Chief at \$57,70 per hour for a total of \$1,154 and GS-13, step 5 Program Analyst at 100 hours for this of \$4,883 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2014.)

FNS program specific staff developed the form instructions and related policies for the State agencies and will compile the resulting data to ensure compliance with regulations.

Estimated costs are provided in Table A14.1 for the expenses that would not have been incurred without this collection of information.

**Table A.14 - 1 Cost to the Federal Government**

| Currently OMB approved information collection packages                         |                                      |                 | Cost to Federal Government (Reports submitted by SA and Analyzed by HQ or Regional Staff) No ICR drafting Cost in this table |   |
|--|--------------------------------------|-----------------|--|---|
| OMB Control Number   | Worksheet/Form number                | Expiration Date | Headquarter or Regional Staff Grade  | Total Federal Cost (no ICR drafting cost for Program) |
| <b>Child Nutrition Program</b>   |                                      |                 |  |   |
| 0584-0002  | FNS-10                               | 10/31/2015      | GS-12 Step 6   | \$ 3,215.20   |
| 0584-0075  | FNS-13                               | 2/28/2014       | GS-12 Step 6   | \$ 3,348.00   |
| 0584-0280  | FNS-418                              | 3/31/2016       | GS-12 Step 5   | \$ 312,000.00   |
| 0584-0055  | FNS-44                               | 9/30/2016       | GS-12 Step 5   | \$ 2,270,613.00                                       |
| 0584-0067  | FNS-777                              | 5/31/2016       | GS-12 Step 5   | \$ 7,281.90   |
| 0348-0061  | SF-425                               | 2/28/2015       | GS-12 Step 5   | \$ -  |
| <b>Special Nutrition Assistance Program</b>                                    |                                      |                 |  |   |
| 0584-0025  | FNS-101                              | 8/31/2015       | GS-12 Step 5   | \$ 114,035.00   |
| 0584-0069  | FNS-209                              | 9/30/2015       | GS-12 Step 5   | \$ 193,533.00   |
| 0584-0083  | FNS-366A & FNS-366B                  | 4/30/2017       | GS-12 Step 5   | \$ 750,836.00   |
| 0584-0081  | FNS-388 & FNS-388A                   | 3/31/2017       | GS-12 Step 5   | \$ 127,722.00   |
| 0584-NEW   | FNS-778 & FNS-778A                   |                 | GS-12 Step 5   | \$3,348   |
| 0584-0339  | FNS-583                              | 6/30/2014       | GS-12 Step 5   | \$ 902.46   |
| 0584-0037  | FNS-292A&B                           | 7/31/2014       | GS-12 Step 5   | \$ 1,733,185.00                                       |
| 0584-0080  | FNS-46                               | 3/31/2014       | GS-12 Step 5   | \$ 23,185.44  |
| 0584-0542  | FNS-759                              | 8/31/2016       | GS-12 Step 5   | \$ 25,000.00  |
| <b>Food Distribution Programs</b>  |                                      |                 |  |   |
| 0584-0293  | FNS-667, FNS-152, FNS-153, & FNS-667 | 12/31/2014      | GS-12 Step 5   | \$ 595,427.00   |
| 0584-0025  | FNS-191 & FNS-101                    | 8/31/2015       | GS-12 Step 5   | \$ -  |
| 0348-0061  | SF-425                               | 2/28/2015       | GS-12 Step 5   | \$ -  |
| <b>Special Supplemental Food Program for Women, Infants and Children (WIC)</b> |                                      |                 |  |   |
| 0584-0447  | FNS-683 & FNS-203                    | 9/30/2014       | GS-12 Step 5   | \$ 138,892.80   |
| 0584-0541  | FNS-683A                             | 5/31/2016       | GS-12 Step 5   | \$ 561,000.00   |
| 0584-0431  | FNS-648                              | 4/30/2014       | GS-12 Step 5   | \$ 1,491.21   |
| 0584-0045  | FNS-798 & FNS-798A                   | 11/30/2014      | GS-12 Step 5   | \$16,082.50   |
| 0348-0061  | SF-425                               | 2/28/2015       | GS-12 Step 5   | \$ -  |
| <b>Grants Management</b>   |                                      |                 |  |   |
| 0348-0061  | SF-425                               | 2/28/2015       | GS-12 Step 5   | \$ -  |
| <b>Sub Total Estimated Total Annual Cost to Federal Government</b>             |                                      |                 |  | <b>\$ 6,881,098.51</b>                                |
| <b>Estimated Total Contract Cost to Federal Government to maintain FPRS</b>    |                                      |                 |  | <b>\$ 2,334,991.00</b>                                |
| <b>Estimated Total Draft ICR for FPRS</b>                                      |                                      |                 |  | <b>\$ 6,037.00</b>                                    |
| <b>Grand Total Estimates for this ICR Cost to Federal Government</b>           |                                      |                 |  | <b>\$ 9,222,126.51</b>                                |

<sup>1</sup>Hourly rate for GS-12/Step5 and 12/6 staff; <sup>2</sup>Hourly rate for GS-13/Step 5 staff and 14/Step 5 Branch Chief

Criteria Used: Estimates includes Cost for Regional and Headquarter Federal Program Staff to analyze data reported on each FNS forms/worksheets by States. Includes cost for staff to develop policy guidance for forms, includes contract cost to develop and maintain FPRS website, create, print, warehouse or distribute any paper forms if applicable.

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

These currently approved burden hours will be transferred to one OMB control number once approved by OMB. This collection request to transfer 73,287.4 hours from existing information collections and add 3,589.6 new hours due to FNS 778 and 778a forms in use without an OMB number or expiration date. The overall burden estimates for this burden inventory is 76,877.

**16.) For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans to publish a compilation of the data from this information collection. Data collected will be used for internal administration of contracts.

The data is gathered at various times, ranging from monthly, quarterly, annual or final submissions. The information may also be used by FNS to conduct program evaluation, planning and audits, future funding, research, and general statistics.

The data compile is used by the FNS administrator, the Program's Division, FNS Financial Management Division and State Agencies administering FNS Programs to ensure program integrity and compliance. This information is also used to determine eligibility to participate in these programs, ensure acceptance of responsibility in managing an effective food service program, implement systems for appropriating Program funds, and ensure compliance with all statutory and regulatory requirements.

Additionally, FNS uses the data reported on the FNS-778 worksheet to monitor the actual cost of each function against budgeted amounts approved for each State agency. FNS also uses the data to ensure that the Federal rate of reimbursement is appropriate for each function and that the

State agency has met its matching requirement. FNS uses the reported data on the FNS 778A to monitor the actual benefit cost for these projects in each State agency along with participation trends. FNS also uses the data to look at both total costs and cost per case. The actual cost data (along with participation trends) helps us to estimate, budget, and set funding levels for these costs for the upcoming fiscal year.

| <b>A.16 - 1 Project Time Schedule</b> |  |
|---------------------------------------|--|
| <b>Activity</b>                       | <b>FPRS Time Schedule</b>                                  |
| Completed Reports in FPRS             | 4 months after OMB approval and quarterly thereafter       |
| Validation                            | 10 - 12 months after OMB approval and quarterly thereafter |
| Analyses                              | 12 - 18 months after OMB approval and quarterly thereafter |
| Publication                           | No publication of reports                                  |

**17.) If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

FNS plans to display the OMB approval number and the expiration date on this information collection.

**18.) Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”**

There are no exceptions to the certification statement.