

**SUPPORTING STATEMENT**

**Application and Certification of  
Food Stamp Program Households**

**OMB No: 0584-0064**

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**A. Justification**

**1. Circumstances making the collection of information necessary.**

This is a revision to a currently approved information collection burden under OMB No. 0584-0064, Food Stamp Forms: Applications, Periodic Reporting, and Notices, expiration 12/31/2010, for the Supplemental Nutrition Assistance Program (SNAP) to reflect reporting and recordkeeping requirements and changes contained in the final rule “Food Stamp Program: Eligibility and Certification Provisions of the Farm Security and Rural Investment Act of 2002,” (FSRIA) which is currently under review at the Office of Management and Budget. The statutory provisions are included in Attachment A. Please note that although the final rule continues to refer to the program name as the Food Stamp Program, this request uses the new program name, Supplemental Nutrition Assistance Program or SNAP, which was made effective on October 1, 2008 by the Food, Conservation and Energy Act of 2008 (FCEA). This document also includes changes resulting from the above-referenced rule to the currently approved information collection burdens under OMB No. 0584-0496, State Agency Options, expiration October 31, 2010 and OMB No. 0584-0083, Operating Guidelines, Forms and Waivers, expiration October 31, 2010, which will be merged into these packages once this collection is approved by OMB.

The Food and Nutrition Act of 2008 (the Act) establishes SNAP, a means-tested program that provides supplemental food assistance to needy households. In order to receive benefits, households must submit an application for assistance and meet the program’s eligibility criteria. The Act specifies national eligibility standards and imposes certain administrative

requirements on State agencies in administering the program. SNAP is directly administered by State welfare agencies, which are responsible for determining the eligibility of applicant households and issuing benefits to those households entitled under the Act.

This information collection is necessary to ensure that applicant and participating households are in fact eligible for assistance and that program participants receive the correct amount of assistance to which they are entitled. In addition to information provided by households, this information collection also includes information that the Act requires State agencies to provide to applicant and participating households in order to comply with statutory and regulatory procedures governing the certification process. For example, the Act requires State agencies to notify households prior to changing the amount of a household's assistance or terminating benefits as a result of changes which affect eligibility for assistance or benefit amounts. Information collected is limited to the items necessary for the administration and enforcement of the SNAP in accordance with applicable laws and regulations.

The full impact of these changes is discussed in detail in Section 12 of this Supporting Statement.

The Federal procedures for implementing the application and certification procedures in the Act are in Title 7 of the Code of Federal Register (CFR) Parts 271, 272, and 273. Part 271 contains general information and definitions, Part 272 contains requirements for participating State agencies, and Part 273 contains procedures for the certification of eligible households. (A copy of the relevant sections of these Parts is provided as Attachment B).

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

This information collection contains several specific components. For each component, the respondents subject to the information collection, the information included, and the uses of that information are discussed below. Unless otherwise mentioned the information collections listed below are included in OMB No. 0584-0064.

### **What Will Be Collected and From Whom?**

Initial Application for SNAP. Section 273.2 of the SNAP regulations requires that each applicant household complete and file an application, either in paper or electronic form. The application contains detailed information about each household member, income, and resources that is necessary to determine if the applicant household is entitled to assistance and, if so, the benefit amount. This information is used by the State agencies that administer the program to determine household eligibility and benefit amounts.\_

Application for SNAP Recertification. Under the Act and section 273.10(f) of the regulations, all households participating in SNAP must be assigned certification periods of a definite length. Under section 273.14, in order to continue participating in SNAP, ongoing households must apply for recertification prior to the end of their current certification periods. The recertification form is similar to the initial application and is completed and used in the same manner.

Monthly Report. Currently, three State agencies, Massachusetts, Oregon and Minnesota, are using monthly reporting for a portion of their caseloads. Under section 273.21, households subject to monthly reporting are required to submit reports of their circumstances on a monthly basis. The report requests the information necessary to determine eligibility and benefits of affected households. Households subject to monthly reporting are assigned

certification periods of 12-months and submit 11 monthly reports a year plus the application for recertification.

Quarterly Report. Under section 273.12 (a)(4) State agencies may require households to report changes on a quarterly basis. Currently, California is the only State that requires households to report changes in circumstances on a quarterly basis. Since households are not required to submit a separate quarterly report when they submit an application for recertification, the quarterly report is submitted 3 times a year for households in California.

Simplified Report. Section 273.12(a)(5) in the final rule, formerly Section 273.12(a)(1)(vii), allows State agencies to establish a simplified reporting (SR) system, under which most households are only required to report when the household's gross income exceeds 130 percent of the Federal poverty level. Prior to FSRIA, only working households were permitted to be on SR, and households with earned income that were assigned certification periods of longer than 6 months were required to submit an interim report in the sixth month. Under the final rule implementing FSRIA, State agencies were given the option of including most households assigned a certification period of at least 4 months in their SR systems; households assigned certification periods greater than 6 months must submit an interim report by the sixth month. Because the final rule permits State agencies to assign certification periods of 6 months or less, they can eliminate the regulatory requirement for submission of an interim report. However, State agencies may opt to require households to submit interim reports at intervals from every 4 months to every 6 months. The only other mandatory reporting requirement applies to certain able-bodied adults without dependents (ABAWDs). Under Section 6(o) of the Act and 7 CFR 273.24, ABAWDs are limited to 3 months of SNAP eligibility in a 36-month period unless they are employed an average of

the 80 hours a month or participating in a qualifying work program. ABAWDs, regardless of their household's reporting system, are required to report changes in their employment status that may affect their eligibility. Currently, 50 State agencies have adopted simplified reporting for all or some of the households within the State. Of the States using SR, 18 assign certification periods of 6 months or less to SR households, thereby eliminating the need for the interim report. These households would, instead, be required to complete a recertification application. Ten States assign certification periods of 12 months and the remaining States assign certification periods of different lengths depending on household circumstances.

Change Report Form. Under section 273.12(a)(1), households not subject to monthly, quarterly reporting or simplified reporting must report most changes in household circumstances within 10 days from the date that the change becomes known to the household. Currently, 31 States utilize change reporting for portions of their caseloads. Wyoming is the only state that uses change reporting for the majority of its caseload.

Notice of Eligibility or Denial. This notice is used by State agencies to advise households of the disposition of their application for initial certification or recertification. If the household is denied, the notice contains the reason(s) for the denial and advises the household of its right to appeal.

Notice of Missing or Incomplete Report. This notice is used by State agencies to advise ongoing households when they have failed to submit the required monthly, quarterly or semiannual report altogether or, if the household submitted the report, that some of the information required to be included in such reports was not provided.

Request for Contact (RFC). The RFC notice is used to contact the household when the State agency receives information regarding a potential change in a household's eligibility or benefits and such information is not sufficient for the State agency to determine exactly how the household's status would be affected. Examples of situations in which the State agency would issue an RFC include, but are not limited to, an incomplete change report form or a computer match indicating a change that requires additional clarification from the household.

Notice of Missed Interview (NOMI). As the name implies, the NOMI is issued by State agencies to households that fail to appear for their scheduled initial or recertification interview, or in the case of households subject to telephone interviews, fail to contact the State agency or receive telephone calls initiated by the local office. The household may respond to the notice by requesting that the interview be rescheduled.

Notice of Expiration (NOE). State agencies are required to mail a NOE to currently participating households at least 30 days prior to the expiration of their current certification period. The NOE is usually accompanied by the Application for Recertification. The NOE advises the household that its certification period is expiring and that to continue receiving assistance, the household must file its Application for Recertification in a timely manner.

Notice of Adverse Action (NOAA). The NOAA is issued by State agencies to participating households whose benefits will be reduced or terminated as the result of a change in household circumstances. The NOAA is typically used when the change was not reported directly by the household.

Adequate Notice. The adequate notice is sent to households by the State agency when the household's benefits are reduced or terminated based on information reported by the



household itself.

Transitional Benefits Notice (TN). FSRIA amended the Act to provide for an option for States to provide transitional benefits to families leaving the Temporary Assistance for Needy Families program. The Act amended and expanded the transitional benefit alternative provided pursuant to the regulatory authority. State agencies that opt to provide transitional benefits must provide eligible families a TN that includes detailed and specific information about the household's transitional benefits and rights. Because the TN and the NOE are very similar, the reporting burden associated with the TN is included in the reporting burden for the NOE. State agencies have also incurred startup costs associated with developing transitional benefits. Because these costs were a one-time only expense and have already been incurred we have not included them in this information collection.

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Homeless shelter estimate. State agencies will no longer need to collect information on shelter costs for homeless households. FSRIA requires that State agencies choosing to use the homeless shelter deduction must set the deduction at \$143 monthly. Because the amount of the homeless shelter is fixed, this provision will not impose any future reporting or record keeping burden.

Establishing and reviewing standard utility allowances (SUAs). This requirement is mandated by the SNAP regulations at 7 CFR 273.9(d)(6). Many State agencies already have one or more approved standards, which they update annually. State agencies may use information already available from case files, quality control reviews or other sources and from utility companies. State agencies may make adjustments based on cost-of-living

increases. The information will be used to establish standards to be used in place of actual utility costs in the computation of the excess shelter deduction. State agencies are required to submit the amounts of these standards and methodologies used in developing and updating the standards to FNS when they are developed or changed.

Mandatory utility standards. FSRIA provided State agencies with the option of mandating the use of the SUA. State agencies are permitted to establish additional standards to implement this provision. They must show that mandatory utility standards will not increase program costs. Request for FNS approval to use a standard for a single utility must include the cost figures upon which the standard is based. If the State wants to mandate use of utility standards but does not want individual standards for each utility, the State needs to submit information showing the approximate number of food stamp households that would be entitled to the nonheating and noncooling standard and the average cost of their actual utility costs now plus the standards that State proposes to use and an explanation of how they were computed. If the State does not have actual data, it will need to pull a sample of cases to obtain it.

Self-employment costs. State agencies may submit a request to FNS to use a method of producing a reasonable estimate of the costs of producing self-employment income in lieu of calculating the actual costs for each household with such income. Different methods may be proposed for different types of self-employment. The proposal shall include a description of the proposed method, the number and type of households and percent of the caseload affected, and documentation indicating that the proposed procedure will not increase program costs. State agencies may collect this data from household case records or other sources that may be available.

Amendments to the State of Plan of Operations

The changes mandated by FSRIA will require a one-time amendment to the State Plan of Operations.

**3. Use of Information Technology and Burden Reduction.**

In compliance with E-Government Act of 2002 (E-Gov), State agencies have the authority to use the technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and reporting requirements contained in this submission. Food and Nutrition Service (FNS) has made every effort to provide for electronic submission as an alternative to paper submission in compliance with the E-Gov. FNS provides funding to support the development of electronic systems through Federal matching of States' administrative costs.

FSRIA requires all States that maintain a website to post a copy of their application for SNAP assistance on the website in each language that the State provides applications. State agencies have the authority to use the information technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and reporting requirements contained in this submission. All State agencies (100%) have automated their SNAP eligibility systems. States send aggregate level data on participation, benefits issued, and other basic program information to FNS using the Food Programs Reporting System (FPRS) via this website: <https://fprs.fns.usda.gov>. FNS does not receive client-specific data, such as applications or individual case records.

**4. Efforts to Identify Duplication and Use of Similar Information.**

Because of the numerous Federal or State means-tested programs each with its own eligibility rules and benefit criteria, duplication of information collection and reporting can inevitably result for both States and households. For SNAP purposes, States are required to limit collection to information necessary to comply with the SNAP statutory requirements and to protect program integrity without imposing undue burden on respondents. However, State agencies may design multi-program forms and notices and often do so. Most States use a joint application for the Temporary Assistance to Needy Families Program (TANF) and SNAP, allowing applicants to apply for both programs with a single application form. Some States also include applications for the Medicaid program and general assistance programs with the TANF/SNAP application. While this may reduce the reporting burden for some information, if applications for too many programs are included in the same form, the forms may become too long and complicated and may deter households from applying. State agencies are in the best position to determine which applications and forms can efficiently be combined considering the similarities among the various programs and the State agency's application processing systems.

**5. Impacts Small Businesses or Other Small Entities.**

Information being requested or required has been held to the minimum required for the intended use.

**6. Consequences of Collecting the Information Less Frequently**

Not collecting information necessary to certify households in accordance with the Act or changing the frequency of information collection or reporting requirements as they relate to the application, certification, and continued eligibility of households would result in a direct violation of the Act and its implementing regulations (e.g. the Act sets the eligibility standards and allows State agencies to set certification periods for most household up to 12 months). Further, benefits could be overissued, underissued, or provided to ineligible households if the necessary information is not collected or actions are not taken timely.

**7. Special Circumstances Relating to the Guideline of 5 CFR 1320.5.**

Section 6(c) of the Act authorizes monthly reporting by households and authorizes the Secretary to prescribe such regulations as the Secretary may deem appropriate. Quarterly and simplified reporting will not suffice because the law allows households to report on a monthly basis. However, the number of monthly reporting households has decreased with the expansion of quarterly and simplified reporting waivers, so this has become less significant. There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5CFR 1320.5.

**8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.**

FNS published a notice in the Federal Register on June 22, 2007, at 72 FR 3447 soliciting comments on this information collection. No comments were received in response to this notice. FNS also solicited comments on this information collection in the proposed rule implementing FSRIA, published in the Federal Register on April 16, 2004 at 69 FR 20724

(see Attachment C). FNS received one comment on the rule (Attachment D), which was not directly related to the burden estimate; our response to the commenter is attached (Attachment E). FNS National Office staff meets with staff from FNS regional offices, state offices, and public interest groups to discuss a variety of subjects related to SNAP, including the application process.

**9. Explanation of Any Payment or Gift to Respondents.**

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

**10. Assurance of Confidentiality Provided to Respondents.**

Section 11(e)(8) of the Act and 7 CFR 272.1(c) limit the use or disclosure of information obtained from applicant households or contained in the case files of participating households to persons directly connected with the administration of the SNAP; other Federal or federally-assisted means-tested programs; persons directly connected with the verification of immigration status of aliens; the Office of the Comptroller General of the U.S. for audit and examination authorized by any other provisions of law; local, State, or Federal law enforcement officials for the purpose of investigating an alleged violation of the Act or regulations; agencies of the Federal Government for purposes of collecting the amount of an overissuance from Federal pay; and any Federal, State or local law enforcement officer if the member is a fleeing felon or a parole violator. The application for benefits contains personal identifying information on individuals doing business with FNS. Therefore, FNS published a Privacy Act Notice System of Records Notice (SORN) March 31, 2000, in the

Federal Register, 65 FR 17251, to specify the uses to be made of the information collected (Attachment F).

11. **Justification for Sensitive Questions.**

Section 5 of the Act specifies basic SNAP eligibility requirements, including but not limited to, those relating to income, resources, and expenses. Section 16 (e) requires State agencies to collect social security numbers as a condition of eligibility and provides that State agencies shall use such numbers in the administration of the program and State agencies shall have access to the Social Security Administration's computerized information system for purposes of determining or verifying a household's eligibility and benefit level.

In order to comply with the Computer Matching and Privacy Acts, the final regulation continue to require that State-designed SNAP application forms contain a statement informing households that their social security numbers will be used in the administration of the program to check the identity of household members, prevent duplicate participation, and to facilitate making mass changes. A statement must also be included on State-designed applications informing households that other information provided by the household will be used in computer matching with other agencies such as the Department of Health and Human Services, the Social Security Administration, and the Immigration and Naturalization Service, and program reviews and audits to make sure the household is eligible for SNAP benefits and that such checks may result in criminal or civil action or administrative claims against persons fraudulently participating in the program.

In order to comply with Civil Rights requirements, State-designed applications must contain a nondiscrimination statement and solicit racial/ethnic information from applicants. The applicant must be notified that reporting the information is voluntary, and it will not affect the household’s eligibility or benefit determination.

**12. Estimates of Hour Burdens Including Annualized Hourly Costs.**

The estimated reporting burden for each individual component of this information collection affected by the final rule, including the number of respondents, frequency of response, average time to respond and annual hour burden are shown in the following Tables. The burden narrative (Attachment G) details the reporting and recordkeeping burden.

**0584-0064 - Application and Certification of Food Stamp Program Households**

<b>OMB #0584-0064</b>	<b>Requirement</b>	<b>No. Respondents</b>	<b>Avg. No. Responses Per Respondent</b>	<b>Frequency of Responses</b>	<b>Total Annual Responses</b>	<b>Hours Per Response</b>	<b>Annual Burden hrs</b>
<b>Affected Public State Agencies</b>							
<b>Reporting Burden</b>	Child Support Payment	5	1	1	5	20	100
	Simplified Reporting	50	78,806.14	1	3,940,307	0.1837	723,834
	Postponing changes in deductions - Reporting forms	5	1	1	5	20	100
	Transition Notice	6	1	1	6	20	120
	<b>Total SA Reporting Burden</b>	<b>50</b>			<b>3,940,323</b>		<b>724,154</b>
<b>Households</b>							
<b>Reporting</b>	Simplified Reporting	3,940,307	1	1	3,940,307	0.1336	526,425



<b>Burden</b>							
	<b>Total Household Reporting Burden</b>	<b>3,940,307</b>			<b>3,940,307</b>		<b>526,425</b>

\*\* Rounded

**0584-0496 – Food Stamp Forms: State Agency Options**

<b>OMB # 0584-0496</b>	Requirement	Estimated # Respondents	Response annually per respondent	Total Annual Responses	Hours Per Response	Annual Burden Hours
Affected Public						
State Agencies						
<b>Reporting Burden</b>	Standard Utility Allowance	52	1	52	2.5	130
	Self-employment costs	10	1	10	10	100
	<b>Reporting Totals</b>	<b>52</b>		<b>62</b>		<b>230</b>
<b>Recordkeeping Burden</b>	Recordkeeping	53	1	53	.1169	6
	<b>Recordkeeping Totals</b>	<b>53</b>		<b>53</b>		<b>6</b>
	<b>Total Recordkeeping and Reporting Burden</b>	<b>53</b>		<b>115</b>		<b>236</b>
	<b>Total Number of Record Keepers</b>	<b>53</b>				

**0584-0083 - Food Stamp Program: State Plans of Operation**

<b>OMB # 0584-0083</b>	Estimated #	Response annually	Total Annual	Hours Per Response	Annual
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	respondents	ally per respon- dent	nual Re- sponses	sponse	hours
Affected Public					
<b>State Agencies</b>					
Amendment to the State Plan of Operation	53	3	159	.25	40
<b>Total Reporting Burden</b>	<b>53</b>		<b>159</b>		<b>40**</b>

\*\*Rounded

### Total Recordkeeping and Reporting Burden.

The total recordkeeping and reporting burden associated with the final rule for this information collection is estimated at 1,250,855 hours based an estimated 3,940,360 respondents and annual responses totaling 7,880,904.

### Annualized Cost to Respondents.

OMB No. 0584-0064

SNAP information collection requirements described herein are imposed primarily on State welfare agency clerks and eligibility workers. Standard wage rate categories used in determining annualized burden costs are based on the Bureau of Labor and Statistics (BLS) website which indicates the employment cost of \$18.90 per hour for State and local eligibility workers and administrative support staff. The value used is \$9.45 per hour to reflect that one-half of the total State cost is reimbursed by the Federal government. The current minimum wage rate of \$7.25 per hour is used to calculate annualized costs for individuals applying for SNAP benefits. Annualized costs for each collection based on these wage rates are shown in the table below.

ANNUALIZED	Activity	Anticipated Total	Labor
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<b>COSTS</b>		<b>Hrs</b>	<b>(US \$)</b>
<b>Household</b>			
<b>Members</b>			
<b>\$7.25</b>			
	Simplified reports data collection	526,425	3,816,581
	<b>Total annual burden to households</b>	<b>526,425</b>	
	<b>Total cost to households</b>		<b>\$3,816,581</b>
<b>State agency</b>			
<b>Clerks or</b>	Simplified reports processing	723,834	\$6,840,231
<b>Eligibility</b>	Determination of Child Support	100	\$945
<b>Staff</b>	Notice on reporting forms to disregard changes in deductions	100	\$945
<b>\$9.45</b>	Transition Notice	120	\$1134
<b>18.90 - 50% Federal Reimbursement</b>			
	<b>Total annual State burden</b>	<b>724,154</b>	
	<b>Total cost to State agencies</b>		<b>\$6,843,255</b>
	<b>Cost to Federal Government (Federal share of State costs)</b>		<b>\$6,843,255</b>
	<b>Total cost to State &amp; Federal agencies</b>		<b>\$13,686,510</b>
	<b>TOTAL ANNUAL BURDEN</b>	<b>1,250,579</b>	
	<b>TOTAL COSTS</b>		<b>\$17,503,091</b>

OMB No. 0584-0496

SNAP information collection requirements described herein are imposed primarily on State welfare agency staff at the State level. Standard wage rate categories used in determining annualized burden costs are based on the BLS website which indicates the employment cost of \$22.22 per hour for State staff. The value used is \$11.11 per hour to reflect that one-half of the total State cost is reimbursed by the Federal government.

<b>ANNUALIZED COSTS</b>	<b>Activity</b>	<b>Anticipated Total Hrs</b>	<b>Labor (US \$)</b>
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<b>State Level Staff</b> <b>\$11.11</b> <b>22.22 - 50% Federal Reimbursement</b>	Homeless shelter estimate	0	0
	Establishing and reviewing utility standards	130	1,444
	Mandatory utility standards	0	0
	Self-employment costs	100	1,111
	Recordkeeping	6	67
	<b>State Agency Cost</b>		<b>2,622</b>
	<b>Federal Costs</b>		<b>2,622</b>
	<b>Total Governmental Cost</b>		<b>\$5,244</b>
<b>Total Annual Burden</b>		<b>236</b>	

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<b>ANNUALIZED COSTS</b>	<b>Activity</b>	<b>Anticipated Total Hrs</b>	<b>Labor (US \$)</b>
<b>State Agency State level Staff</b> <b>\$11.11</b> <b>22.22 - 50% Federal Reimbursement</b>	Amendment to State Plan of Operations	40	
	<b>State Agency Cost</b>		<b>\$444</b>
	<b>Federal Costs</b>		<b>\$444</b>
	<b>Total Governmental Cost</b>		<b>\$888</b>
<b>Total Annual Burden</b>		<b>40</b>	

**13. Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers.**

There are no capital/start-up or ongoing operation or maintenance costs associated with this information collection.

**14. Annualized Cost to Federal Government.**

Fifty percent of the administrative costs incurred by State welfare agencies are reimbursed by FNS. Thus, the estimated wage rates for State agency staffs noted above and reflected on the attached spreadsheet have been reduced by 50% to reflect cost sharing. Costs associated with the burden imposed on SNAP applicants and recipients are not reimbursed.

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Total governmental costs:	=	<b>\$13,686,510</b>
State Share @ 50%	=	<b>\$6,843,255</b>
Federal share @ 50%	=	<b>\$6,843,255</b>
OMB No. 0584-0496		
Total governmental costs:	=	<b>\$5,244</b>
State Share @ 50%	=	<b>\$2,622</b>
Federal share @ 50%	=	<b>\$2,622</b>
OMB No. 0584-0083		
Total governmental costs:	=	<b>\$888</b>
State Share @ 50%	=	<b>\$444</b>
Federal share @ 50%	=	<b>\$444</b>
Cost to Headquarters for staff support	=	<b>\$9,406</b>
Total Cost To Federal Government		<b>\$ 6,855,727</b>

**15. Explanation for Program Changes or Adjustments.**

This is a revision of a currently approved data collection. The changes in the information collection burden reflect the changes contained in the final rule “Food Stamp Program: Eligibility and Certification Provisions of the Farm Security and Rural Investment Act of 2002” as well as those changes resulting changes in State policy and caseload growth. The current burden for 0584-0064 is 23,642,768 which have increased by 1,250,579 [0584-0496 increased by 236 hours and 0584-0083 increased by 40 hours for a total of 1,250,855 for this request (due to the FSRIA Final Rule)] for a total of 24,893,623 burden hours for 0584-0064.

Program Changes: 0584-0064

Reporting

Program increases. Section 273.12(a)(1)(vi) child support payment exclusion/deduction.

This provision allows State agencies to rely solely on the State's Child Support Enforcement (CSE) agency in determining a household's obligation and actual child support payments.

FNS anticipates 5 State agencies in each of the next 3 years will choose this option, resulting in a burden increase of 100 burden hours (5 States X 20 hours = 100 hours).

Sections 273.12(b)(1), 273.12 (b)(2), and 273.12(h)(2) give States the option to postpone acting on changes that would affect the amount of deductions. If a State adopts this option, it must revise all reporting forms. FNS anticipates 5 State agencies in each of the next 3 years will choose this option, resulting in a burden increase of 100 burden hours (5 States X 20 hours = 100 hours).

Section 273.29 provides State agencies the option to offer transitional benefits to families leaving the Temporary Assistance for Needy Families (TANF) program. State agencies that choose this option must provide a transitional notice to families eligible for transitional benefits. FNS calculated an increase in burden of 120 hours each year (6 X 20 hours = 120 hours) based on 6 States adopting this option each year over a 3 year period.

Program decreases. Section 273.12(a)(1)(vii) simplified reporting. This provision removes restrictions placed on the participation of certain households in simplified reporting, allows State agencies the option to require households to submit a report if their income exceeds 130 percent of the Federal poverty level, and allows State agencies the option to assign

certification periods of 6 months or less, thus eliminating the need for interim reports.

Changes resulting from this provision led to a decrease of 496,465 State burden hours and a decrease of 653,958 household burden hours. Because of simplified reporting, the number of States utilizing both quarterly and change reporting has decreased since the proposed rule was published, resulting in a burden reduction of 1,150,423 hours.

Program changes result in a total burden hour increase of 320 hours and a decrease of 1,150,423 hours.

Program Changes: 0584-0496

#### Reporting

Program increases. Section 273.9(d)(6)(iii)(B) standard utility allowances (SUAs). This provision allows State agencies to establish SUAs and requires them to review and adjust established SUAs annually. FNS estimates a burden increase of 130 hours per year.

Section 273.11(b) allows self-employment gross income to be reduced by the cost of producing such income. The provision allows State agencies, with approval from FNS, to establish the methodology for offsetting the costs of producing self-employment income. FNS estimates a total burden increase of 100 hours annually.

#### Recordkeeping

Program increases. State agencies are required to keep records of the information gathered concerning SUAs and self-employment costs. FNS estimates a total of 6 burden hours annually.

Program changes result in a total burden hour increase of 236 hours.

Program Changes: 0584-0083

Reporting

Program increases. Section 272.2 amendment to the State Plan of Operation. State agencies are required to plan and budget program operations and establish objectives for each year.

State agencies that choose to implement optional provisions of FSRIA must include these options in their State Plans of Operation. The total increased burden for this collection is 40 hours.

Program changes result in a total burden hour increase of 40 hours.

Program changes for all three collections (0584-0064, 0584-0496, 0584-0083) resulted in a total burden hour decrease of 1,149,827.

**16. Plans for Tabulation and Publication and Project Time Schedule.**

There are no plans to publish statistical analyses.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions.**

There are no exceptions to the certification statement.