

SUPPORTING STATEMENT

**Supplemental Nutrition Assistance Program (SNAP) Forms: Applications, Periodic
Reporting, and Notices**

OMB No: 0584-0064

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Appendix A: Burden Narrative

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A. Justification

This submission provides justification for revisions to the information collection reporting and recordkeeping requirements associated with the initial application and recertification application of households for the Supplemental Nutrition Assistance Program (SNAP). These changes affect the information collection approved under the Office of Management and Budget (OMB) Control Number 0584-0064, expiration date April 30, 2016.

During the process of preparing this information collection, the Department realized that the burden activities and time estimates for OMB No. 0584-0064 are no longer adequate for meeting the burden needs of rising household cases, local offices with fewer caseworkers, multi-program applications and automated forms.

Section 3502.2 of the Paperwork Reduction Act (PRA) defines burden as “time, effort, or financial resources expended by persons to generate, maintain, or provide information to or for a Federal agency.” In keeping with the PRA definition of burden, we created sub-activity categories that allowed for the inclusion of time and effort expended on behalf of households and State agencies and revised the time estimates. By adjusting the burden activities and time estimates, the collection under OMB No. 0584-0064 can more accurately reflect all of the burden-generating activities in the initial application and recertification process for SNAP. This collection has also been updated with the most recent household participation data (FY 2014) to account for caseload growth in SNAP.

1. Circumstances making the collection of information necessary

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.

This is a revision of a currently approved collection (OMB No. 0584-0064; expiration date April 30, 2016). The information collection is necessary to ensure that households applying for and participating in SNAP are eligible for assistance and that program participants receive the correct amount of assistance. The Food and Nutrition Act of 2008 (the Act), as amended, specifies national eligibility standards and imposes certain administrative requirements on State agencies in administering the program. Information must be collected from households to assure that they are

eligible for the program and that they receive the correct amount of SNAP benefits. Any information collected is limited only to what is necessary for the administration and enforcement of SNAP. The Federal procedures for implementing the application and certification procedures in the Act are in Parts 271, 272, and 273 of the Title 7 of the Code of Federal Regulations. 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.

2. 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.

The information collected is provided by applicant and participating households and is limited only to what is necessary for the administration of SNAP as provided by the Act. In States administering SNAP, agencies obtain information from households through the initial application and recertification process as well as through reports to determine program eligibility and benefit levels. The required activities are illustrated in the following section.

A detailed explanation of revisions to these activities is included in the attached Burden Narrative (Appendix A).

REPORTING BURDEN:

Application to Participate in SNAP

Section 273.2 of the SNAP regulations requires that each household complete and file an application, either in paper or electronic form. The application contains detailed information about each household member and their income, employment, shelter expenses, medical expenses (if applicable) and resources that is necessary to determine if the applicant household is entitled to assistance. The application process also includes verification of certain information provided on the application and an interview where the State agency worker asks a series of questions and clarifies information from the application. The activities associated with the initial application process are included below:

1. Application form
2. Interview
3. Verification (required by SNAP regulations at section 273.2(f)(1) &(2))

- Income
- Identity
- Alien Eligibility
- Social Security Number
- Medical expenses (if claimed and to receive income deduction)
- Residency
- Utility Expenses (if the State agency does not utilize a standard utility allowance and the applicant wishes to claim expenses)
- Hours worked (Able-bodied Adults w/out Dependents)
- Legal obligation to pay child support and actual child support payments
- Disability
- Household composition
- Questionable information
- Students work hours (Not a mandatory verification, but for students enrolled in higher education State agencies determine student compliance with the 20-hour minimum requirement under 273.5(b)(5) to determine program eligibility)

Application for SNAP Recertification

Section 273.10(f) of the SNAP regulations provides that a household participating in SNAP must be assigned a certification period of a definite length. Under section 273.14(b), in order to continue participating in SNAP, an ongoing household must apply for recertification prior to the end of their current certification periods. The recertification process also includes verification of certain information, if it has changed, and an interview. The activities associated with the recertification application process are included below:

1. Application form
2. Interview
3. Verification (required by SNAP regulations at section 273.2(f)(8)(i))
 - Income (if source changed or amount changed by more than \$50)
 - Social Security Number (if Social Security number is new)
 - Medical expenses (unreported and reoccurring expenses that have changed by more than \$25)
 - Legal obligation to pay child support (if there were changes in obligation to pay)
 - Utility expenses (if has changed by more than \$25)
 - Hours worked (Able-bodied Adults w/out Dependents)
 - Other information which has changed may be verified

Travel Time

SNAP regulations section 273.14(b)(3) require households to have a face-to-face interview at least annually for certification purposes, unless the household is certified for longer than 12 months or the face-to-face interview is waived due to a hardship. FNS has estimated a household burden of two hours to account for the time spent traveling to and from the local office to attend an in-office interview. This estimate is supported under Section 3502.2 of the Paperwork Reduction Act where “the term ‘burden’ means time, effort, or financial resources expended by a person to generate, maintain, or provide information to or for a Federal agency.” Based on this, FNS believes that a two hour travel time should be captured as a burden for the household for the face-to-face interview component of the application process. This time estimate is also supported by the findings of the *Food Stamp Program Access Study* (see the *Sources* page of Burden Narrative) where applicant households reported making an average of 2.4 trips to the local office for filing the application, meeting with caseworkers and providing verification documentation. This study found that on average, households spent 2.2 hours traveling between their homes and the SNAP office.

Periodic Reports

Monthly Report: Under section 273.21, a household subject to monthly reporting is required to submit reports of its circumstances on a monthly basis. The report requires information necessary to determine eligibility and benefits of the affected households. A household subject to monthly reporting is assigned a certification period of 12-months and submits 11 monthly reports a year and an application for recertification.

Quarterly Report: Under section 273.12 (a)(4), a State agency may require households to report changes on a quarterly basis. Since a household is not required to submit a separate quarterly report when it submits an application for recertification, it would submit a quarterly report 3 times a year.

Simplified Report or Periodic Report: Section 273.12(a)(5) allows a State agency to establish a simplified reporting (SR) system, under which most households are only required to report when a household’s gross monthly income exceeds 130 percent of the Federal poverty level. State agencies have the option of including households assigned a certification period of at least 4 months in their SR systems; households assigned certification periods greater than 6 months must submit a periodic report by the sixth month. State agencies may opt to require households to submit periodic reports

at intervals from every 4 months to every 6 months. A SR household certified for longer than 6 months must submit a periodic report.

Change Report: Under section 273.12(a)(1), a household not subject to monthly reporting, 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.

ABAWD Report: The only other mandatory reporting requirement applies to certain able-bodied adults without dependents (ABAWDs). Under Section 6(o) of the Act and section 273.24 of the SNAP regulations, 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, are participating in a qualifying work program, are exempt from ABAWD work requirements, or reside in an area for which the State has obtained a waiver to the ABAWD time limit from FNS. Regardless of a household's reporting system, ABAWDs are required to report if their weekly work hours fall below the 20-hour average minimum, unless they are exempt from ABAWD work requirements.

Notices

Notice of Eligibility or Denial: Under Section 273.10(g)(1)(i) and (ii), a State agency must issue either a notice of eligibility or a notice of denial to advise households of the disposition of their application for initial certification or recertification. If the household is denied benefits, the notice must contain the reason for denial and advise the household of its right to a fair hearing.

Notice of Missing or Incomplete Report: Under Sections 273.12(a)(4)(iii) and 273.12(a)(5)(iii)(D), A State agency must issue a notice of missing or incomplete reports to advise an ongoing household when it has submitted an incomplete report, or failed to submit the required monthly, quarterly or semiannual report altogether.

Notice of Missed Interview (NOMI): Under Sections 273.2(h)(1)(i)(D) and 273.14(b)(3)(iii), a State agencies must issue a NOMI to a households that fails to appear for its scheduled initial or recertification interview, or if the household is subject to telephone interviews, fails to contact the State agency or receive telephone calls initiated by the local office. A household may respond to a NOMI by requesting to reschedule the interview.

Notice of Expiration (NOE): Under Section 273.14(b)(1), State agencies must to mail a NOE to a currently participating household at least 30 days prior to the expiration of its current certification period. 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. The NOE is usually accompanied by the Application for Recertification.

Notice of Adverse Action (NOAA): Under Section 273.13(a), a State agency must issue a to a household whose benefits will be reduced or terminated as the result of a change in household circumstances.

Adequate Notice: Under Sections 273.12(a)(4)(v) and 273.13(b), a State agency must issue an adequate notice when a household's benefits are reduced or terminated based on information reported by the household itself. Adequate notices can also be used when mass changes occur. Mass changes are certain changes initiated by the State or Federal government that may affect a State's entire SNAP caseload or significant portions of the State's SNAP caseload.

Request for Contact (RFC): According to section 273.12(c)(3)(i) of the regulations, a State agency must issue an RFC notice when it 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.

Transitional Benefits Notice (TN): According to section 273.29, 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.

RECORDKEEPING:

Case Records: State agencies must keep records as may be necessary to ascertain whether the program is being conducted in compliance with the Act and the regulations. The Act and Section 272.1(f) of the regulations require States to maintain such records for a period of 3 years from date of origin. States are allowed to store records using automated retrieval systems and other features

that do not rely exclusively on the collection and retention of paper records.

Duplicate Participation System: Under Section 272.4(e), a State agency must to search its files for duplicates in order to prevent individuals from receiving benefits in more than one household and to prevent households from receiving benefits in more than one jurisdiction within the State. The Act further requires State agencies to establish a system that will prevent an individual from receiving both SNAP benefits and cash benefits in lieu of SNAP benefits in an SSI cash-out State or under a cash-out demonstration project.

3. 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 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 reporting and recordkeeping requirements contained in this submission. 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.

All State agencies 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

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.

States are required to limit any collection of information to only what is necessary to comply with statutory SNAP requirements and to protect program integrity without imposing undue burden on respondents. Because of the numerous Federal or State means-tested programs with variations in

eligibility rules and benefit criteria, duplication of information collection and reporting may result for both States and households.

SNAP regulations permit State agencies to use multi-program forms and notices. Most States use a joint application for the Temporary Assistance to Needy Families Program (TANF) and SNAP, which allow a household to apply for both programs with a single application form. Some States also include applications for the Medicaid program and other general assistance programs with the TANF/SNAP application. While joint applications may reduce the reporting burden for some information, the forms may become too long and complicated if too many applications are combined, which may deter some households from applying altogether.

5. Impacts 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.

This collection does not have a direct impact on small businesses or other small entities. State agencies administer SNAP at the State level and collect the necessary data to ensure correct eligibility determinations and delivery of benefit. Of the 53 SNAP State agency respondents, none are small entities.

6. 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.

In order to certify households for SNAP, the collection of certain information is necessary. Changing the frequency of the information collection or reporting requirements related to the application, certification, and continued eligibility of households would contradict the intent of the eligibility standards set forth in the Act, and hinder the duty of State agencies to certify households for appropriate lengths of time prescribed in the Act and SNAP regulations. Further, if the necessary information is not collected or resulting actions not taken in a timely manner, participating households could be over-issued or under-issued SNAP benefits, or even provided to ineligible households.

7. Special Circumstances Relating to the Guideline 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; monthly**
The Monthly Report (7 CFR 273.21) is collected more than quarterly to determine eligibility and benefits of the affected households. Monthly collection is necessary to ensure the integrity of issuing benefits per regulatory requirements.
- **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 other special circumstances that cause this information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5.

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

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 notice in the Federal Register on May 15, 2015 (80 FR 27885), soliciting comments on this information collection. No comments were received in response to this notice. 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

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.

10. Assurance 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.

Section 11(e)(8) of the Act and 7 CFR 272.1(c) of the regulations limit the use or disclosure of information obtained from applicant households or contained in case files of participating households to persons directly connected with the administration of SNAP, such as: 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 over issuance from Federal pay; and any Federal, State or local law enforcement officer if a household 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, entitled USDA/FNS-10: Persons Doing Business with the Food and Nutrition Service, in the Federal Register (65 FR 17251) to specify the uses to be made of the information collected.

11. Justification for Sensitive Questions

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.

Section 16 (e) of the Act requires each household member to furnish their social security number (SSN) to State agencies and for State agencies to use SSNs in administration of SNAP, but only to the extent necessary for the purposes of determining or verifying a household's eligibility and benefit level. Under SNAP regulations at 273.2(b)(4), while providing an SSN is voluntary, refusal of a household member to provide an SSN will result in the denial of SNAP benefits.

In addition, in order to comply with Civil Rights requirements, any State Agency SNAP application form must contain a nondiscrimination statement and solicit racial/ethnic information from applicants. The applicant must be notified that reporting such information is voluntary and will not affect the household's eligibility or benefit determination.

No other private or sensitive questions will be asked.

12. Estimates of Hour Burdens Including Annualized Hourly Costs

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 burden activities and baseline burden under OMB No. 0584-0064 have been changed to establish burden activities and estimates that more accurately reflect all of the information collection activities within the SNAP application and recertification process. The estimated reporting and recordkeeping burdens for this collection, including the number of respondents, frequency of response, average time to respond and estimated man-hours, are shown in the Burden Table (Appendix A). The Summary of the burden appears below.

SUMMARY OF BURDEN (OMB #0584-0064)	
TOTAL NO. RESPONDENTS	14,622,419
AVERAGE NO. RESPONSES PER RESPONDENT	45.04
TOTAL ANNUAL RESPONSES	658,539,827
AVERAGE HOURS PER RESPONSE	0.1795
TOTAL ANNUAL BURDEN HOURS REQUESTED	118,221,440
CURRENT BURDEN INVENTORY	24,897,946.68
DIFFERENCE	93,323,493.490

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

Annualized Costs to Respondents

SNAP information collection requirements described herein are imposed primarily on State agency eligibility workers. Standard wage rate categories used in determining annualized burden costs were based on the most recent Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data from May 2014, using the corresponding occupation code 43-4061, Eligibility Interviewers, Government Programs.¹ According to the most recent BLS data, workers in this occupation earn a median wage rate of \$20.29 per hour. States would incur an annualized administrative cost of \$20.29 per hour burden in the information collection. However, fifty percent of administrative costs incurred by State agencies are reimbursed by FNS, which results in a reimbursement value of \$10.15 per burden hour. The Federal minimum wage rate of \$7.25 per hour is used to calculate annualized costs for households applying for SNAP benefits.²

A summary of annualized costs for the collection is shown in the table below. A detailed calculation is included in the Burden Table (Appendix A).

Respondent	Cost*
State Agencies and Local Offices	\$356,351,410

¹ <http://www.bls.gov/oes/current/oes434061.htm>;

² <http://www.dol.gov/whd/minimumwage.htm>

Households	\$602,568,720
Total	\$958,920,130

*Rounded to the nearest whole dollar

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

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 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.

14. Annualized Cost to 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.

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

The Federal cost also includes the cost associated with the preparation of this information collection package. This includes Federal worker time at FNS for the following:

	Hours	Hourly Wage Rate*	Total**
GS-12/2 Program Analyst	320	\$37.82	\$12,102
GS-13/6 Assistant Branch Chief	24	\$50.77	\$1,219
Senior Consultant	20	\$55	\$1100
Cost of Federal workers			\$14,421
50% Federal Share of State Cost			\$356,351,410

Total Federal Cost	\$356,365,831
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*Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/15Tables/html/DCB_h.aspx)

**Rounded to the nearest whole dollar.

15. Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

Changes in burden resulted from adjustments to the burden baseline, to account for activities not previously captured under collection package OMB No. 0584-0064, the update of household participation to FY 2011 - FY 2012 data, and also the inclusion of the burden hours associated with the households' travel time to the local office for the initial and recertification interviews.

Adjustment due to Burden Baseline Correction: While organizing this information collection, FNS realized that the burden activities and time estimates for OMB No. 0584-0064 in the burden baseline are no longer adequate for meeting the burden needs of rising household cases and local offices with scarce resources and fewer caseworkers, multi-program applications and automated forms. Therefore, in keeping with the PRA definition of burden (per section 3502.2 of the PRA), we created sub-activity categories that allowed for the inclusion of time and effort expended on behalf of households and State agencies and revised the time estimates associated with these activities. The sub-activities have increased the burden baseline for State agencies as well as households.

Adjustment due to Increase in Household Participation: The number of SNAP participants has increased. We have updated the household data to the most recent available information (FY 2011 - FY2012) to calculate a burden that is based on the most current program participation levels.

These adjustments will result in an increase of 93,323,493.490 hours, once approved by OMB.

16. 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.

There are no plans to publish statistical analyses.

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

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.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.