APPENDIX C

Estimate of the Information Collection Burden for Supplemental Nutrition Assistance Program: Review of Major Changes in Program Design and Management Evaluation Systems Final Rule (RIN 0584-AD86) (OMB #0584-NEW)

OMB has previously reviewed this collection with the proposed rule (Supplemental Nutrition Assistance Program: Review of Major Changes in Program Design and Management Evaluation Systems, May 3, 2011, 85 FR 24820) and filed a comment under OMB Number 0584-0579. There no changes to burden activity; however, there is an increase in the total number of respondents which has increased the burden estimates associated with the final rulemaking.

AFFECTED PUBLIC: SNAP STATE AGENCIES

REPORTING REQUIREMENTS

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7 CFR 272.15(a)(3) requires States provide both descriptive and analytic
information when initially reporting a major change. FNS believes States will
have completed the majority of the analysis in the normal course of their own
planning and decision making. The descriptive information should also be readily
available.

Initial analysis of Major Change: We estimate 23 State Agencies (SA) will submit an estimated average of 0.9782608 responses annually for a total annual response of 22.5. We also estimate that it will take these SA approximately 40 hours per SA to complete and report this activity to FNS = $(23 \text{ SA} \times 0.9782608 \text{ frequency per SA} = 22.5 \text{ total annual responses per SA} \times 40 \text{ time per SA} = 900 \text{ total annual burden hours for this activity)}.$

2. 7 CFR 272.15(b)(1)-(3) requires States implanting a major change to report to FNS, on a quarterly basis, a set of required data elements ("automatic reporting requirements") related to the change.

Reports required without additional data collection: We estimate 15 State Agencies (SA) will submit an estimated average of 4.2 responses annually for a total annual response of 63. We also estimate that it will take these SAs approximately 22 hours per SA to complete and report this activity to FNS = (15 SA x 4.2 frequency per SA = 63)

total annual responses per SA x 22 hours per SA = 1,386 total annual burden hours for this activity).

3. 7 CFR 272.15(b)(4) allows for FNS to require additional information to the quarterly reports in order to monitor the impact of a major change on integrity and access in SNAP. The additional reporting elements will be determined on a case-by-case basis in consultation with the State Agency.

Reports required with additional data collection: We estimate 6 State Agencies (SA) will be required to submit additional data elements at an estimated average of 4.5 responses annually for a total annual response of 27. We also estimate that it will take these SAs approximately 273.25 hours per SA to complete and report this activity to FNS = (6 SA \times 4.5 frequency per SA = 27 total annual responses per SA \times 273.25 hours per SA = 7,377.75 total annual burden hours for this activity).

THERE ARE NO RECORDKEEPING REQUIREMENTS