

SUPPORTING STATEMENT for

OMB Control Number 0584-0064:

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

Final Rulemaking: Supplemental Nutrition Assistance Program (SNAP): Eligibility,
Certification, and Employment and Training Provisions of the Food, Conservation and Energy

Act of 2008 (RIN 0584-AD87)

7 CFR Parts 272, 274 and 280

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Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3
A2. PURPOSE AND USE OF THE INFORMATION.....3
A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....4
A4. EFFORTS TO IDENTIFY DUPLICATION.....4
A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....5
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....5
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....5
A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....6
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....7
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....7
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....7
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....8
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....10
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....10
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....10
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....11
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....11
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....11

Appendices

- Attachment A: Burden Narrative
- Attachment B: Burden Table

A1. Circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This submission explains the burden calculations for the Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) to include the reporting and recordkeeping requirements contained in the Final Rule “SNAP: Eligibility, Certification, and Employment and Training Provisions,” which implements 12 provisions of the Food, Conservation and Energy Act of 2008 (P. L. 110 – 246) (FCEA). The FCEA amended and renamed the Food Stamp Act of 1977, the Food and Nutrition Act of 2008 (the Act), which specifies eligibility, benefits, and certification requirements for administering the program. State agencies are responsible for determining the eligibility of applicant households and issuing benefits to those households entitled to benefits under the Act. These changes affect the information collection approved under the Office of Management and Budget (OMB) Control Number 0584-0064, expiration date May 31, 2019. A detailed explanation of revisions to these activities required by the accompanying Final Rule is included in the attached Burden Narrative (Appendix A).

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

This 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.

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.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In 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.

A4. Efforts to identify duplication.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

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

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

Explain any special circumstances that would cause an information collection to be conducted in a manner:

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

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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be

explained.

A 60 Day Notice was published with the proposed rule on May 4, 2011 at 76 FR 25413. No comments were received with respect to the information collection.

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.

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

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

No payment or gift will be provided to respondents.

A10. Assurances of confidentiality provided to respondents.

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

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.

A11. Justification for any questions of a sensitive nature.

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

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.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

The detailed, 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 B).

Reporting Burden

Due to program changes associated with rulemaking, a summary of the burden estimate for reporting requirements appear in the table below.

Total Reporting Burden for 0584-0064 (Hours)

TOTAL NO. RESPONDENTS	14,619,695
AVERAGE NO. RESPONSES PER RESPONDENT	32.16
TOTAL ANNUAL RESPONSES	470,170,504.93
AVERAGE HOURS PER RESPONSE	0.1567
NET REPORTING BURDEN	73,680,169
PREVIOUS Submission: Burden Hours	114,211,604
Difference Due to Program Changes	-40,531,435.27

Recordkeeping Burden

As indicated in the final rule, the estimated burden impact to recordkeeping is zero and does not affect the currently approved recordkeeping burden inventory under OMB No. 0584-0064.

SUMMARY OF TOTAL BURDEN (OMB #0584-0064)	
TOTAL NO. RESPONDENTS	14,622,419
AVERAGE NO. RESPONSES PER RESPONDENT	44.04
TOTAL ANNUAL RESPONSES	643,938,886
AVERAGE HOURS PER RESPONSE	0.1206
TOTAL ANNUAL BURDEN HOURS REQUESTED	77,690,005
CURRENT BURDEN INVENTORY	118,221,440
DIFFERENCE	(-40,531,435)

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

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 2015, 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 \$20.69 per hour. States would incur an

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

annualized administrative cost of \$20.69 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 \$10.35 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 B).

Respondent	Cost* (rounded to nearest whole dollar)
State Agencies and Local Offices	\$367,134,695.05
Households	\$304,926,541.92
Total	\$672,061,236.97

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

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

A14. Provide estimates of annualized cost to the Federal government.

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

	Hours	Hourly Wage Rate*	Total**
GS-12/2 Program Analyst	320	\$38.37	\$12,278
GS-13/6 Assistant Branch Chief	24	\$51.51	\$1,236
Senior Consultant	20	\$55	\$1100

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

Cost of Federal workers	\$14,615
50% Federal Share of State Cost	\$367,134,695.05
Total Federal Cost	\$367,149,310

*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/2016/general-schedule/>)

**Rounded to the nearest whole dollar.

A15. Explanation of program changes or adjustments.

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

The net decrease to OMB Control Number 0584-0064 is -40,531,435 hours due to program changes associated with rulemaking. Since the publication of the proposed rule, the existing information collections in which the PRA burden will be merged have changed. Changes to those collections result in adjustments to the total burden calculation. Due to changes in participation levels and other mathematical corrections³ to 0584-0064, the adjusted burden estimate for reporting requirements associated with this rule appear in the table below.

REPORTING							
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³ The proposed rule estimated small reductions in reporting burden for certain administrative requirements. These reductions were removed as burden associated with these requirements had not been previously accounted for in the OMB-cleared information collection. These estimates were small and inconsequential to the net burden impact.

Section of Regulation	Title	Estimated Number of Respondents	Reports filed Annually per Respondent	Total Annual Responses	Estimated Avg. No. of Burden hours Per Response	Estimated Total Burden hours	Notes
STATE AGENCY LEVEL							
Part 273	Change of Program Name	4 4.00	1.00	44.00	8.00	352.00	No change
273.9(c)	Exclusion of combat-related pay	-	-	-	-	-	No change
273.9(d)(1)(iii)	Increase of minimum standard deduction	-	-	-	-	-	No change
§§ 273.9(d)(4) & 273.10(e)(1)(i)(E)	Elimination of cap on dependent care expenses - SA Operation Manual update	5 3.00	1.00	53.00	8.00	424.00	No change
"	Newly certified households w/ dependent care	5 3.00	9,517.26	504,4 15.04	0.08	4 2,034.59	Adjusted for change in participation level
"	Existing households w/ dependent care	5 3.00	12,412.9 0	657,8 83.89	0.03	2 1,929.46	Adjusted for change in participation level
273.10(e)(2)(ii)(C)	Minimum benefit increase	5 3.00	1.00	53.00	0.50	26.5	No change
273.8(b)	Asset indexation	5 3.00	16.98	900	0.02	15.03	No change
273.8(e)(2)(i)	Exclusion of retirement accounts from resources						
"	Newly certified households	-	-	-	-	-	Burden removed due to duplication with total application burden.

"	New and Existing households	-	-	-	-	-	Burden reduction removed. Due to mathematical correction.
273.8(e)	Exclusion of education accounts from resources						
"	Newly certified households	-	-	-	-	-	Burden removed due to duplication with total application burden.
"	New households (existing households not included, already captured in respondents under retirement accounts provision)	-	-	-	-	-	Burden reduction removed. Due to mathematical correction.
§§273.12(a) (5), (b), and (c)	Expansion of simplified reporting						
"	Newly added elderly or disabled households	4 7.00	53,000.0 0	2,49 1,000	0.18	45 7,596.70	No change.
§272.2(d)(1) (H) and 273 Subpart H	Transitional benefits alternative	-	-	-	-	0.00	No change
§§ 273.2(b) & (c), 273.12(c) and (d), 273.14(b), and 273.21(h)	Telephonic signature	3.00	1.00	3	120.00	360.00	No change
§§ 273.2(e) (2)& 273.14(b)(3)	Telephonic interviews	4 0.00	1.00	40.00	2.00	(80.00)	No change
273.5(b)(5)	Averaging student work hours	-	-	-	-	-	Burden reduction removed. Due to

							mathematical correction.
§§ 273.7(e)(1)(viii) & 273.7(e)(4)(iii)	Employment and Training: Job retention services	-	-	-	-	-	No change
State Agency Burden Total		53		3,654,392		522,658	
HOUSEHOLD LEVEL							
Part 273	Change of Program Name	-	-	-	-	-	No change
273.9(c)	Exclusion of combat-related pay	-	-	-	-	-	No change
273.9(d)(1)(iii)	Increase of minimum standard deduction	-	-	-	-	-	No change
§§ 273.9(d)(4) & 273.10(e)(1)(i)(E)	Elimination of cap on dependent care expenses						
"	Newly certified households w/ dependent care	504,415.04	1.00	504,415.04	0.08	42,118.66	Adjusted for change in participation level.
"	Existing households w/ dependent care	657,884	1.00	657,883.89	0.03	21,973.32	Adjusted for change in participation level.
273.10(e)(2)(ii)(C)	Minimum benefit increase	-	-	-	-	-	No change
273.8(b)	Asset indexation	-	-	-	-	-	No change
273.8(e)(2)(i)	Exclusion of retirement accounts from resources						
"	New and existing households	-	-	-	-	-	Burden reduction removed. Due to mathematical correction.
273.8(e)	Exclusion of education accounts from						

	resources						
"	New households (existing households not included, already captured in respondents under retirement accounts provision)	-	-	-	-	-	Burden reduction removed. Due to mathematical correction.
§§273.12(a)(5), (b), and (c)	Expansion of simplified reporting	2,491,000	1	2,491,000.00	0.0835	207,998.50	No change.
§272.2(d)(1)(H) and 273 Subpart H	Transitional benefits alternative	-	-	-	-	-	No change
§§ 273.2(b) & (c), 273.12(c) and (d), 273.14 (b) and 273.21(h)	Telephonic signature	-	-	-	-	-	No change
§§ 273.2(e)(2) & 273.14(b)(3)	Telephonic interviews	20,663,092	1	20,663,092.00	-2	(41,326,184)	Adjusted for change in participation level.
273.5(b)(5)	Averaging student work hours	-	-	-	-	-	No change
§§ 273.7(e)(1)(viii) & 273.7(e)(4)(iii)	Employment and Training: Job retention services	-	-	-	-	-	No change
Household burden total		24,316,391		24,316,390.93		(41,054,094)	
Total Reporting burden of Eligibility, Certification and E&T Rule		24,316,444		27,970,782.79		(40,531,435.24)	

*Figures in table rounded to two decimals.

A16. 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.

A17. Displaying the OMB Approval Expiration Date.

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

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

A18. Exceptions to the certification statement identified in Item 19.

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

There are no exceptions to the certification statement.