

Appendix D: Burden Narrative

Reporting Requirements—7 USC 2024 Violations and Enforcement

7 USC 2024(b), (c) and (f) Penalties for benefit misuse. These paragraphs makes clear that the misuse of benefits is subject to a number of penalties imposed by a Federal or State investigation.

FNS enters into a Memorandum of Understanding with State agencies to conduct relater/EBT-related investigations. This proposed reporting would require State agencies to report on their specific investigatory activity to ensure that investigations are being completed in a proper and efficient manner.

7 USC 2024(a) Use of EBT cards for investigations. This paragraph authorizes the Secretary to provide SNAP benefits to those individuals that the Department deems necessary to ensure enforcement of the provisions of this Act or the regulations issued pursuant to this Act.

and

7 USC 2016 Issuance and Use of Program Benefits

7 USC 2016(e) State liability for benefits. This paragraph states that the State agency is strictly liable for all EBT benefits in its possession. This includes those acquired for use in investigations.

Benefits are obligations to the Federal government and State agencies need to be accountable for them when utilized in investigations. This proposed reporting requirement provides a mechanism for State agencies to account for the specific use of these benefits.

There are 53 States and U.S. Territories that operate SNAP. FNS expects two responses per year for a maximum of 106 responses ($53 \times 2 = 106$). The estimated average number of burden hours per response is 2 hours resulting in estimated total burden hours of 212 ($106 \times 2 = 212$).

Recordkeeping Requirements—7 USC 2024 Violations and Enforcement

There is no recordkeeping burden associated with this information collection request.