

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW

Proposed Rule: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance

Program (SNAP)

(RIN 0584-AE62)

Mary Rose Conroy

Chief, Program Design Branch

Supplemental Nutrition Assistance Program

USDA, Food and Nutrition Service

3101 Park Center Drive

Alexandria, Virginia 22302

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1. 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 an existing collection in use without OMB approval associated with a proposed rule, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), FNS is seeking a new OMB control number for the information collection associated with this rulemaking. Section 5(a) of the Food and Nutrition Act of 2008, as amended (the Act) provides that households in which each member receives benefits under a State program funded under part A of Title IV of the Social Security Act (SSA) (also known as Temporary Assistance for Needy Families (TANF) block grants) shall be categorically eligible for the Supplemental Nutrition Assistance Program (SNAP). Currently, SNAP regulations broadly interpret “benefits” to mean cash assistance and non-cash or in-kind benefits or services from any TANF program. In operation, this has allowed categorical eligibility for SNAP to be conferred on households based on receipt of minimal benefits issued by TANF programs which may not conduct a robust eligibility determination and do not meaningfully move families toward self-sufficiency. Due to the current broad flexibility afforded States in the construction of TANF programs, households who would not otherwise have qualified for SNAP due to their income or resources are considered categorically eligible and therefore able to be in receipt of SNAP. Such categorical eligibility does not comport with the intent of Section 5(a) which has clear parameters regarding the income and resource limits that SNAP households must meet, and compromises program integrity as the administrative streamlining of categorical eligibility is intended to be applied only when the conferring program has properly determined eligibility. Government auditors have raised program integrity concerns about the wide adoption of categorical eligibility policies and the impact on both a household’s receipt of a meaningful TANF benefit and the eligibility determination used in conferring programs.

Therefore, the Department proposes updating the regulations to further refine and tighten categorical

eligibility requirements based on receipt of TANF benefits. Specifically, the Department proposes: (1) to define “benefits” for categorical eligibility to mean ongoing and substantial benefits; and (2) to restrict the types of non-cash TANF benefits conferring categorical eligibility to those that focus on subsidized employment, work supports and childcare. The proposed rule would also require State agencies to inform FNS of all non-cash TANF benefits that confer categorical eligibility.

The proposed revisions would create a clearer and more consistent nationwide policy that limits categorical eligibility to households that have sufficiently demonstrated need by qualifying for ongoing and substantial benefits from TANF programs designed to assist households and move them towards self-sufficiency. In addition, the revisions would help ensure that receipt of nominal, one-time benefits or services do not confer categorical eligibility and would address program integrity issues that have surfaced since the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 changed the programs whose benefits confer categorical eligibility. The Department believes these revisions will maintain categorical eligibility’s dual purpose of streamlining program administration while ensuring that SNAP benefits are targeted to the appropriate households, in line with Congressional intent

Out of fifty-three (53) State agencies, forty-three (43) SNAP State agencies currently have adopted expanded categorical eligibility. The ten (10) State agencies that have not taken the option to expand categorical eligibility will be unaffected by this proposed rule. These proposed changes are expected to increase the information collection burden upon applicants (individuals/households) and State agencies as fewer households are categorically eligible and consequently States must verify more household’s resources. This is expected to significantly decrease the total number of households receiving SNAP. Because all State agencies must collect resource information for applicants that are not categorically eligible, they will be required to make changes to their application processes. States will be required to inform FNS regarding the types of non-cash TANF programs that are used to confer categorical eligibility. Other minimal burdens imposed on State agencies by this proposed rule are within the course

of SNAP activities as outlined in regulations; these activities include making determinations of SNAP eligibility and sending notifications following those determinations; these burden activities are already captured and approved by OMB under OMB Control # 0054-0064 Expiration Date: 7/31/2020.

These existing requirements in use without an OMB control number impact a current collection that has been used without a valid OMB control number or expiration date. However, FNS plans to account and maintain these burden hours under a new OMB control number assigned by OMB. Once these requirements have been approved by OMB, the agency plans to publish another notice in the Federal Register announcing to the public OMB's approval.

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 purpose of this information collection associated with rulemaking is to require State agencies to comply with the required activities performed to properly certify and recertify SNAP eligible households as well as to determine which households are ineligible to receive SNAP due to having resources above the SNAP resource thresholds as defined in 7 CFR 273.8(b)(1). This information is required in 7 CFR 273.2(f)(1) & (2) for both households and State Agency eligibility workers during verification of resources at the initial application and 7 CFR 273.2(f)(8)(i) for both households and State Agency eligibility workers during verification of resources at recertification application. This information will be used by State agencies to determine applicant household eligibility.

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.

FNS is committed to complying with the E-Government Act of 2002, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. FNS does not have a system set up for this information to be submitted to FNS electronically since information on SNAP household eligibility requirements is collected and retained at the State agency level where this program operates. State agencies will inform FNS of the types of non-cash TANF benefits that confer categorical eligibility in their States, and submit this information via email. We do not expect any data for this information collection to be submitted electronically to FNS.

4. 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.

Every effort has been made to avoid duplication. FNS solely monitors and administers the Supplemental Nutrition Assistance Program. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. The Food and Nutrition Act of 2008, as amended requires FNS to evaluate the financial resources of households to ensure they are below the statutory threshold. To date, FNS has been conducting the information collection and imposing burden for States and SNAP applicant households regarding resource verification without OMB approval. However, out of 53 State agencies, 43 State agencies have adopted expanded categorical eligibility policies¹: therefore, only 10 States are currently collecting resource information as part of the SNAP eligibility determination process. The ten (10) State agencies that have not taken the option to expand categorical eligibility will be unaffected by this proposed rule; these States are currently conducting the information collection and imposing burden for States and SNAP applicant households regarding resource verification without OMB approval. This rule will significantly narrow the types of

¹ Per Section 5(j) of the Act, households who are categorically eligible for SNAP are considered to have met the resource limitations set in 6(a) of the Act; therefore, SNAP State agencies do not separately verify the resources of households who are categorically eligible.

programs whose benefits may confer categorical eligibility. The proposed restriction of categorical eligibility would *reduce* the number of households who would be categorically eligible for SNAP and, therefore, would require States to assess more households' resources to determine if they are eligible for SNAP benefits; under the rule, all 53 State agencies (including the 10 States currently collecting this data without OMB approval) will now be required to collect resource information from more households. The burden table reflects information collection activities for all 53 State agencies; both the 10 that are currently collecting this data without OMB approval and the 43 who would have to assess many more household's resources to determine if they are eligible for SNAP. The rule would also require State agencies to inform FNS of the types of non-cash TANF benefits that confer categorical eligibility in their States. As 10 States do not currently have non-cash TANF programs that confer categorical eligibility and would not be required to report to FNS, FNS anticipates that only the current 43 States with non-cash programs would be required to report to FNS under the new rule.

5. 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.

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

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.

This is an ongoing, mandatory data collection required by statute. The information is collected to ensure integrity and compliance with SNAP regulations by State agencies. If this information is not collected or is collected less frequently, States would not be in compliance with SNAP statute or regulations or be able to properly certify households and millions of dollars in SNAP benefits would be issued to ineligible households.

7. 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;
- 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 circumstances that will cause the information collection to be inconsistent with the guidelines of 5 CFR 1320.5.

8. 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.

A 60-day Federal Register Notice is embedded in the proposed rule titled “**Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (RIN 0584-AE62).**” Comments will be received and evaluated on the information collection requirements during that time. During this time, interested members of the public have the opportunity to provide FNS with comments concerning the necessity, practical utility, accuracy, and merit of the information collection activities proposed. Comments will be addressed during the final stage of rulemaking with the final rule information collection request.

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.

When FNS finalizes an information collection package, the information is posted on the Agency Web page for review and comment received by stakeholders such as State agencies, community groups, and the public regarding any proposed changes as the result of legislative, regulatory or administrative changes. FNS Regional offices are in contact with State agencies, who provide feedback on processes and procedures for the information collection. This feedback helped FNS shape our burden estimates for this collection. This information can be found in question 12.

To date, FNS has been conducting the information collection and imposing burden for States and SNAP applicant households regarding resource verification without OMB approval; however, as discussed earlier, due to expanded categorical eligibility policies, few States are currently collecting resource information as part of the SNAP eligibility determination process. FNS has estimated the current reporting burden for the States without expanded categorical eligibility policies and provided these numbers in the chart under the column “Previous Burden in Use without Approval”.

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

No payment or gift will be provided to respondents.

10. Assurances of confidentiality provided to respondents.

The Department complies with the Privacy Act of 1974. No confidential information is associated with this information collection. Section 7(b) of the Privacy Act (P.L. 93-579, U.S.C. 552a) requires that Federal, State or local government agencies which request individuals to disclose their SSN be informed (1) whether that disclosure is mandatory or voluntary, (2) by what statutory authority or other authority each number is solicited, and (3) what uses will be made of the number. The Privacy Act requires that before personal identifying information (such as SSN or EIN) may be shared with other entities, a Privacy

Notice must first be published. FNS published such a Privacy Act notice FNS 10- Persons Doing Business with Food Nutrition Service (System of Records) to specify the routine uses to be made of the information in this collection. This Notice was published in the Federal Register on March 31, 2000 Volume 65, Number 63, and is located on pages 17251-17251.

Section 9 of the Act, U.S.C. 2018, authorizes collection of the information on the application. Section 278.1(b) of the FSP regulations provides for the collection of the owners' SSN, EIN and tax information.

11. 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.

There are no questions of a sensitive nature included in this clearance package.

12. 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.

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.

To date, FNS has been collecting the information collection and imposing burden for States and SNAP applicant households regarding resource verification without OMB approval; however, as discussed earlier, due to expanded categorical eligibility policies, ten (10) States are currently collecting resource information as part of the SNAP eligibility determination process. FNS has estimated the current reporting burden for the States without expanded categorical eligibility policies and provided these numbers in the chart under "Previous Burden in Use without Approval" and also estimated the new burden that this rule would impose.

FNS is requesting an estimated 4,313,828.72= (691,092.51existing collection in use without OMB approval + 3,622,736.20 imposed due to this rulemaking) for reporting from 53 State agencies and an estimated 840,899.43s = (142,652.58existing collection in use without OMB approval + 698,246.85 imposed due to this rulemaking) for reporting from 10,301,146 SNAP applicant/households). There are no recordkeeping requirements resulting from this proposed rule.

State Agency Burden Assessment Feedback

FNS first needed to estimate the amount of time that resource verification would take for State agencies. To do so, FNS consulted with eight States that currently do not have expanded categorical eligibility and, therefore, subject SNAP households to a resource test and asked these States to provide estimates of the amount of time that State agency staff spent verifying resources with clients at initial and recertification. FNS learned that four of these States verify resources when resources are close to the resource limit, two States only verify resources when questionable and two States verified resources at all times. FNS therefore estimates that, of the 43 States who, under this proposed rule, would now be required to conduct substantially more resource verification, 22 would adopt a policy to verify a household's resources if close to the resource limit (for the purposes of this discussion, "High Limit States"), 10 would verify resources only when deemed questionable ("Self-Attestation States") and 11 would verify resources for households at all times ("Always" States). The burden table column "Estimated Total Burden Hours" also accounts for the 10 States that are currently collecting resource information without OMB approval (5 "High Limit" States, 3 "Self-Attestation States" and 2 "Always" States; so that the total burden reflected in the table is for all 53 State agencies at both initial as well as recertification.

Using the estimates that each group of States provided for the amount of time needed to verify resources and averaging the responses, FNS estimates that State agency staff in States with a policy to verify resources if close to the limit or questionable would on average spend 12.3 minutes (0.205 hours) per case at initial certification and 7.4 minutes (0.123 hours) per case at recertification. FNS estimates

that State agency staff in States who would adopt a policy to verify resources at all times would have a higher burden: 43.75 minutes (0.729 hours) per case at initial certification and 26.25 minutes (0.4375 hours) per case at recertification.

FNS then needed to estimate the percentage of a State's caseload that would be subject to these resource verification requirements in order to calculate the State agency burden. In the estimated 13 States where caseworkers would verify resources at all times, the entire caseload would be subject to verification. In "High Limit" and "Self-Attestation" States, only a certain percent of SNAP applicants would meet the criteria (e.g. substantial resources or questionable information) that would necessitate the caseworker undertaking resource verification. Using caseload data on households' resource levels from a recent study to determine how many households would have resources close to the resource limit,² FNS estimates that States that verify resources near the limit (27) would have to verify about 27% of the time; FNS rounded up to 30% to take into account caseworker discretion to verify when questionable. For the States that verify only when questionable (13) FNS estimates that resources would be verified 10% of the time. Accordingly, in the burden tables the estimated number of households whose resources would be verified by a caseworker are adjusted to 30% of the caseload in the estimated 22 "High Limit" States and 10% of the caseload in the estimated 10 "Self-Attestation" States. The estimated number of households for the 13 "Always" States would be all SNAP applicant households in those States.

This rule would also require State agencies to inform FNS of the types of non-cash TANF benefits that confer categorical eligibility in their States. This specific reporting would be a new reporting requirement under this rule. FNS estimates that it would take one hour of a State agency staff person's time to prepare and send this information to FNS. As 10 States do not currently have non-cash TANF-funded programs that confer categorical eligibility and would not be required to report to FNS, FNS

² Ratcliffe, Caroline, Sara Armstrong, Emma Kalish, Signe-Mary McKernan, Christina Oberlin, Catherine Ruggles, and Laura Wheaton. 2016. "Asset Limits, SNAP Participation, and Financial Stability." Washington, DC. Prepared by the Urban Institute and Orlin Research for the U.S. Food and Nutrition Service. Available online: <https://fns-prod.azureedge.net/sites/default/files/ops/SNAPAssets.pdf>.

anticipates that only the current 43 States with non-cash programs would be required to report to FNS under the new rule. This additional burden is included in the burden tables below. The Department seeks additional comment on how long it would take States to gather, review and report this information.

Household Burden

The Department then had to estimate the burden hours for households to provide verification. FNS referenced the currently approved estimated number of applicants in OMB Control Number 0584-0064; Expiration Date: 7/31/2020 and updated these numbers to reflect the most recently available participation data (FY18) for SNAP initial applicants and recertification applicant households.³

The Department finds it reasonable to use the estimates from OMB approved Information Collection 0054-0064 regarding household burden for providing verification and estimates that providing verification would take 4 minutes or .0668 hours per household at initial certification and 6 minutes or .1002 hours at recertification. Using the estimates above for the number of households in each State subject to verification requirements (100% in 11 States, 30% in 22 States and 10% in 10 States), we then calculated the total number of households that would have to participate in this annual burden. We have rounded these burden times in the chart below.

The Department is very interested in States comments on the requested information burden, as the vast majority of households in most States have been certified under expanded categorical eligibility, and therefore have not been subject to resource verification in recent years. All comments will be reviewed and considered in the rulemaking process. To date, The Department has been conducting the information collection and imposing burden for States and SNAP applicant households regarding resource verification without OMB approval; however, as discussed earlier, due to expanded categorical eligibility policies, few States are currently collecting resource information as part of the SNAP eligibility determination process. The Department has estimated the current reporting burden for the States without expanded

³ National Data Bank data from FY2018, FNS 366-B, Total Initial Applications and Total Recertification Applications.

categorical eligibility policies and provided these numbers in the chart.

The burden estimates we are using without OMB approval is for the current ten states without expanded categorical eligibility; the overall burden collected without OMB approval is 833,745.10 burden hours, this burden total includes 691,092.51 total annual burden hours and 1,747,515.79 total annual responses for State agencies and 142,652.58 total annual burden hours and 1,747,515.79 total annual responses for Individuals/Households (SNAP Participants). The overall estimated burden we are requesting for both the Individuals/Households and State agencies is 5,154,728.15 total annual burden hours and 20,602,334 total annual responses. The reporting burden details are provided below for State Agencies and SNAP applicant households. This request associated with rulemaking reflects an increase of 3,622,736.20 total annual burden hours and 8,553,672.90 total annual responses for State agencies and 698,246.85 total annual burden hours and 8,553,629.901 total annual responses for Households (SNAP Participants).

The following table reflects burden associated with the new information collection requirements.

ESTIMATED ANNUAL BURDEN FOR 0584-NEW, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance

Reg. Section	Respondent Type	Description of Activity	Estimated Number of Respondents	Estimated Frequency of Response	Total Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours	Previous Burden in Use Without Approval	Differences Due to Program Changes	Difference Due to Adjustments	Hourly Wage Rate*	Estimated Cost to Respondents
Affected Public: State Agencies												
273.2(f) (1) & (2)	State Agency Eligibility Worker	Verification of resources at initial application (States verifying all resources)	13	255,661.04	3,323,593.55	0.7292	2,423,564.42	372,856.06	0.00	2,050,708.35	\$21.45	\$51,985,456.79
273.2(f) (1) & (2)	State Agency Eligibility Worker	Verification of resources at initial application (States verifying resources if questionable)	13	25,566.10	332,359.36	0.205	68,133.67	15,723.15	0.00	52,410.51	\$21.45	\$1,461,467.18
273.2(f) (1) & (2)	State Agency Eligibility Worker	Verification of resources at initial application (States verifying resources if close to limit)	27	76,698.31	2,070,854.44	0.205	424,525.16	78,615.77	0.00	345,909.39	\$21.45	\$9,106,064.71
273.2(f) (8)(i)	State Agency Eligibility Worker	Verification of resources at recertification (States verifying all resources)	13	204,211.53	2,654,749.93	0.4375	1,161,453.09	178,685.09	0.00	982,768.00	\$21.45	\$24,913,168.86
273.2(f) (8)(i)	State Agency Eligibility Worker	Verification of resources at recertification (States verifying resources if questionable)	13	20,421.15	265,474.99	0.123	32,653.42	7,535.41	0.00	25,118.02	\$21.45	\$700,415.95

Reg. Section	Respondent Type	Description of Activity	Estimated Number of Respondents	Estimated Frequency of Response	Total Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours	Previous Burden in Use Without Approval	Differences Due to Program Changes	Difference Due to Adjustments	Hourly Wage Rate*	Estimated Cost to Respondents
273.2(f)(8)(i)	State Agency Eligibility Worker	Verification of resources at recertification (States verifying resources if close to limit)	27	61,263.46	1,654,113.42	0.123	203,455.95	37,677.03	0.00	165,778.92	\$21.45	\$4,364,130.13
273.2(j)(2)(ii) & 273.2(j)(2)(i)(B)	State Agencies	Inform FNS of TANF programs that confer categorical eligibility	43	1	43	1	43	0	43.00	0.00	\$19.47	\$837.21
Sub-Total State Agencies			53	643,822.61	10,301,188.69	0.41877	4,313,828.72	691,092.51	0.00	3,622,736.20	\$21.17	\$92,531,540.82
Affected Public: Individual/Households												
273.2(f)(1) & (2)	Applicants for initial certification	Verification of resources at initial application	5,726,807	1	5,726,807	0.0668	382,550.73	64,897.00	317,653.73	0.00	\$7.25	\$2,773,492.80
273.2(f)(8)(i)	Applicants for recertification	Verification of resources at recertification	4,574,338	1	4,574,338	0.1002	458,348.70	77,755.58	380,593.12	0.00	\$7.25	\$3,323,028.09
Sub-Total Individual/Households			10,301,146	1	10,301,146	0.0816316	840,899.43	142,652.58	698,246.85	0.00	\$7.25	\$6,096,520.89
Grand Total Reporting Burden with both affected public			10,301,199	0	20,602,334	0.2502012	5,154,728.15	833,745.10	4,320,983.05	0.00	\$7.25	\$98,628,061.71

Note: The column “Estimated number of respondents” for rows with the regulatory citation 273.2(f)(1) & (2) and 273.2(f)(8)(i) includes both the 10 State Agencies collecting this information without OMB approval and the 43 that would collect this information as a result of the rulemaking, for a total of 53 State agencies affected at application and recertification.

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

The estimated total annual cost to respondents with fully-loaded wages is \$123,066,949.29 (\$92,531,540.82 annual base cost + \$30,535,408.47 fringe benefits). FNS used the estimate of 0.33 percent to account for fully-loaded wages. This is based upon the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2017 National Occupational and Wage Estimates Statistics, Eligibility Interviewers, Government Programs 43-4061 (<http://www.bls.gov/oes/current/oes434061.htm>). The hourly mean wage for functions performed by State agency staff is estimated at \$21.45 per staff hour and for Social and Human Service Assistants 21-1093 functions are valued at \$19.74. The \$7.25 used to calculate a cost to applicants is the Federal minimum wage.

It is estimated that State SNAP agency eligibility workers in the Eligibility, Interviews, Government Programs occupation group (43-4061) in 13 SNAP agencies will spend a total of 2,423,564.42 hours to verify household resources at initial certification at a rate of \$21.45 per hour for a total estimated cost of \$51,985,456.79 for all respondents annually.

It is estimated that State SNAP agency eligibility workers in the Eligibility, Interviews, Government Programs occupation group (43-4061) in 13 SNAP agencies will spend a total of 68,133.67 hours to verify household resources at initial certification at a rate of \$21.45 per hour for a total estimated cost of \$1,461,467.18 for all respondents annually.

It is estimated that State SNAP agency eligibility workers in the Eligibility, Interviews, Government Programs occupation group (43-4061) in 27 SNAP agencies will spend a total of 424,525.16 hours to verify household resources at initial certification at a rate of \$21.45 per hour for a total estimated cost of \$9,106,064.71 for all respondents annually.

It is estimated that State SNAP agency eligibility workers in the Eligibility, Interviews, Government Programs occupation group (43-4061) in 13 SNAP agencies will spend a total of 1,161,453.09 hours to verify household resources at recertification at a rate of \$21.45 per hour for a total estimated cost of \$24,913,168.86 for all respondents annually.

It is estimated that State SNAP agency eligibility workers in the Eligibility, Interviews, Government Programs occupation group (43-4061) in 13 SNAP agencies will spend a total of 32,653.42 hours to verify household resources at recertification at a rate of \$21.45 per hour for a total estimated cost of \$700,415.95 for all respondents annually.

It is estimated that State SNAP agency eligibility workers in the Eligibility, Interviews, Government Programs occupation group (43-4061) in 27 SNAP agencies will spend a total of 203,455.95 hours to verify household resources at recertification at a rate of \$21.45 per hour for a total estimated cost of \$4,364,130.13 for all respondents annually.

It is estimated that State SNAP agency eligibility workers in the Social and Human Service Assistants (21-1093) in 43 State SNAP agencies will spend a total of 43 hours to report on their non-cash categorical eligibility policies at a rate of \$19.74 per hour for a total estimated cost of \$837.21 for all respondents annually.

It is estimated that a total of 5,726,807 SNAP Initial Applicant households will spend a total of 382,550.73 hours to assist in resource verification with the State SNAP agency at a rate of \$7.25 per hour for a total estimated cost of \$2,773,492.80 for all respondents annually.

It is estimated that a total of 4,574,338 SNAP Recertification Applicant households will spend a total of

458,348.70 hours to assist in resource verification with the State SNAP agency at a rate of \$7.25 per hour for a total estimated cost of \$3,323,028.09 for all respondents annually.

13. Estimates of other total annual cost burden.

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/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.

The estimated total annual cost to the Federal government is **\$61,537,670.95** (\$46,265,770.41 annual base cost +\$15,267,704.24 fringe benefits cost). State SNAP agencies' allowable SNAP administrative costs are eligible for 50 percent Federal reimbursement, or approximately 50 percent of the \$ \$92,531,540.82 cost estimated for State agencies which is (46,265,770.41); additionally, the information collection also assumes that a total of 80 hours to draft the information collection for a Federal employee GS-12 Step 6 in the Washington-DC locality, at \$45.59 per hour for a total of **\$3,647.20** and a 10 hours for a Branch Chief Federal employee GS 14 Step 1 to review this information collection at \$54.91 per hour for a total of **\$549.10**. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) effective January 2018.

15. 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.

This is an existing collection without OMB approval resulting from program changes associated with rulemaking for 0584-AE62, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program. We are requesting 5,154,728 burden hours and 20,602,335 total annual responses for this collection. This information collection will add 4,320,983.05 reporting burden hours (833,745.10 burden hours in use without OMB approval + 4,320,983.05 burden hours due to rulemaking) and 8,553,629.90 total annual responses to OMB burden inventory.

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.

This collection does not entail planned statistical use and there are no plans to publish the results of this collection for statistical analyses.

17. 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.

We are not seeking approval concerning the display of the expiration date.

18. 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.