

Supporting Statement for  
Paperwork Reduction Act  
Submission for Review of Major  
Changes in the Supplemental Nutrition  
Assistance Program (SNAP)  
OMB Number 0584-0579

***Prepared by:***

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  - 16. Anonymous GDG
  - 17. Anthony Smith
  - 18. Barbara Sorin

19. Barbara Waugh
20. Basara Nekki
21. Brian Donovan
22. Brian Olson
23. Brooke Calvin
24. Charlotte Smith
25. Concern Mom Anonymous
26. Cornelia Flora
27. David Friel
28. Diana Oskiera
29. Dody Mitchell
30. Elizabeth Cowan
31. Eric Conklin
32. Gail Schwartz
33. Gerald Glover
34. Jacqueline Davis
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36. Joe Brown
37. Kamrin Hewitt
38. Kim DeLaquil
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40. KL Brown
41. Kristin Olson
42. Kristy Welch
43. Leigh Yates
44. Linda Barufaldi
45. Maggie Shelton
46. Mary Steller
47. Melissa Williams
48. Melodi Mullinax
49. Mital Lyons-Warren
50. Mr. and Mrs. Weber
51. Mr. Miller
52. Rhona Lyons
53. Shannon Edwards
54. Syreeta Powell
55. Theresa Doubek
56. Therman Tipton
57. Trevor Daniels
58. Vernice Meade
59. Vicki Tabor
60. Wendy Fenderson
61. Wendy Oppenheimer
62. Win Radigan

- 63. Yingying Yu
- D. Response to Arizona Department of Economic Security
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## A. Justification

- 1. 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 reinstatement, with change, of a previously approved information collection for which approval has expired and is in use without OMB approval. Due to statute, FNS is still legally required to collect this data and is thereby continuing collection in violation of the Paperwork Reduction Act. This collection is associated with the final rule entitled: Supplemental Nutrition Assistance Program: Review of Major Changes in Program Design and Management Evaluation Systems (RIN: 0584-AD86, Publication Date: 1/9/2016, 81 FR 2725). Section 11 of the Food and Nutrition Act (the Act) of 2008, as amended, requires the Department to develop standards for identifying major changes in the operations of State agencies that administer SNAP.

- 2. 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.**

Regulations at 7 CFR 272.15 require State agencies to notify the Department when planning to implement a major change in operations and State agencies to collect any information required by the Department to identify and correct any adverse effects on program integrity or access, including access by vulnerable households.

Data that has been received to date from States that are currently subject to Major Change Reporting has been used to provide additional technical assistance to those States when

needed, both from FNS National Office as well as FNS Regional Offices. This information enables FNS to monitor the impact of States' changes and identify compliance and/or performance issues early.

- 3. 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, 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. State agencies have the authority to use information technology that best suits the needs of their individual or unique systems of operations to comply with this information collection. States are permitted to submit information to FNS via email, and are provided with an optional template to use if they so choose. Currently, FNS does not have any plans to create an electronic submissions system.

- 4. 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.**

FNS is solely responsible for reviewing State agencies major changes in SNAP program design. There are currently no known State agency monitoring systems in place which are designed to obtain data similar to that required for this information collection.

**5. 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 information collection does not affect small business or other small entities. The collection is limited to what is necessary to comply with statutory requirements and to protect SNAP integrity. This information collection is solely limited to SNAP State agencies.

**6. 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 a mandatory, ongoing data collection. The purpose of this information collection is to better inform FNS of the types of impacts major changes in SNAP program design could have on SNAP participants' access to benefits and other key components. Data under this information collection is only collected quarterly with the intention of reducing burden on States. If this collection were not conducted, then FNS would be unable to adequately monitor these changes, identify potential compliance issues, and provide technical assistance to States that are undergoing major changes to program design.

**7. 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 special circumstances that require information collection inconsistent with 5 CFR 1320.5

8. **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.**

The 60-day notice (81 FR 5049) for this submission was published on July 10, 2019 on page 32859. FNS received and posted one (1) germane comment<sup>1</sup> from the Arizona Department of Economic Security regarding the amount of time that the State experienced when developing their baseline report to report out quarterly major changes. FNS also received and posted sixty-three (63)<sup>2</sup> comments that did not respond to the central questions asked in the Federal Register Notice. The National Office also consulted with State agency representatives from Georgia, Massachusetts, and Mississippi on the issue of burden estimates for reporting major changes in SNAP. The contact information for the State agencies is provided below:

Name: Kimberlin Donald / Sean Boyd  
State: Georgia  
Title: SNAP Director / ME Director  
Phone: 404-615-2473

Name: Larry Strebeck  
State: Mississippi  
Title: SNAP Director  
Phone: 601-359-4859

Name: Cynthia Zabin  
State: Massachusetts  
Title: Assistant Director for SNAP Compliance

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<sup>1</sup> Appendix B

<sup>2</sup> Appendices C1-C63

Phone: 617-348-8464

The department understands the concerns expressed about the amount of time estimated to report major changes. Based on the feedback we received from the aforementioned States, FNS has increased the burden estimates for reprogramming efforts and quarterly reporting (described in Item 12) to 96 and 18 hours, respectively. In addition to these increases, FNS has also increased the estimated number of State respondents to 13 in order to account for anticipated changes to non-merit personnel in three States.

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

No payments or gifts to respondents are provided under this information collection.

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

This information collection does not ask any questions that require assurances of confidentiality.

**11. 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.**

This information collection does not ask any questions of a sensitive nature.

**12. 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.**

FNS estimates out of 53 States, 13 States will participate in the information collection request. We estimate a total of **65** annual responses and **3,504** total annual burden hours in the breakout below:

- A) CFR 272.15(a)(3) Initial Analysis of Major Change: Based upon FNS' experience over the last two years, out of the 53 State agencies this data collection impacts, FNS estimates only **13** States submit major changes annually. FNS estimates that the overall annual total of the collection of information for the State agencies is **65** total annual responses and **3,504** burden hours. With an estimated **13** States reporting **1** major change per year (based upon the last two years), the initial reporting and analysis aspect of the rulemaking would be **13** annual responses x **40** hours per initial response per State = an estimated **520** burden hours per year.
- B) CFR 272.15(b)(1)-(3) Reports Required without Additional Data Collection: In terms of State reporting after the initial notification, no additional reporting has been required beyond the automatic reporting requirements. Therefore, FNS is projecting that for 12 of the 13 major changes expected each year there would be no additional reporting burden beyond the automatic reporting. All 13 of the major changes (12 States report without additional data collection and 1 State reports required with additional data collection) estimated each year are expected

to require some automated system reprogramming to generate the required automatic data reporting. Therefore, FNS estimates **12** States will submit this report on a quarterly basis for a total of **4** responses/reports annually for a total of **48** annual responses. We estimate it will take approximately **42** hours per State for a total of **2,016** annual burden hours. [In discussion with the States, we determined it will take 96 hours per State agency reprogramming effort which would be 1,248 hours per year (13 x 96). Preparing the 52 quarterly reports are estimated to require 18 hours per State agency. The total for the 13 States would be 1,248 + 936 hours = 2,184 total hours for reporting (divided by the 13 States = 168 hours per State per year).]

C) CFR 272.15(b)(4) Reports Required with Additional Data Collection:

Furthermore, FNS estimates 1 State is projected to require reports with additional data collection on a quarterly basis for a total of **4** responses/reports annually for a total of **4** annual responses. We estimate it will take each State agency **242** hours per response for a total of **968** burden hours. [Such data will generally be collected through a sample of case reviews. While the required sample sizes may vary based on the type of major change and the proportion of the State's SNAP caseload it may affect, 200 cases per quarter would likely be an upper limit on what FNS could ask of a State. At an estimated one hour to review and report on a case, this would require 800 hours per year for one State each year.] When the **520** hours for major change notifications, the **2,016** hours for reports required without additional data and **968** hours for reports required with additional data are

added the total for the 13 States is **3,504** total annual burden hours. There are **13** total annual responses for major change notifications, **48** total annual responses for reports required without additional data and **4** total annual responses for reports required with additional data for a total of **65** total annual responses.

We do not ask States to perform any sampling or statistical analysis for this collection. However, we do ask for specific data points, but those are for the full population indicated. For example, States may be asked to provide the number of cases that were processed timely, both for the State at large, as well as just for the elderly/disabled population. We do not ask States to provide anything other than Statewide or local project area totals. Typically, States complete reporting requirements by gathering data and compiling a report for the specified date range from their system without any required analysis.

**12a. 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.**

**Reporting Burden Estimates:**

Section	Requirement	States responding per year	Responses per respondent	Number of responses	Hours per response	Total Burden hours
272.15(a)(3)	Initial analysis of Major Change	13	1	13	40	520
272.15(b)(1)-(3)	Reports required without additional data collection	12	4	48	42	2,016
272.15(b)(4)	Reports	1	4	4	242	968

	required with additional data collection					
<b>Totals</b>		13	5 (average)	65	53.9 (average)	3,504

**Recordkeeping or Third-Party Disclosure Burden Estimates:**

There is no recordkeeping or third-party burden associated with this information collection.

**12b. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories**

The overall total annual cost to the respondent with fully loaded wages is \$105,742.66 which includes the (\$79,505.76 annual cost to respondents + \$26,236.90 fringe benefits).

The cost to State agencies is based on \$45.38 per hour for management analyst staff in accordance with the National Compensation Survey: Occupational Wages in the United States, May 2018<sup>3</sup>. This rate after 50 percent reimbursement by FNS is \$22.69.

Therefore, the total cost to respondents is \$79,505.76 (3,504 burden hours x \$22.69).

Affected Public	Burden Hours	Hourly Wage Rate	Cost
Reporting	3,504	\$22.69	\$79,505.76
<b>TOTAL</b>	<b>3,504</b>	<b>\$22.69</b>	<b>\$79,505.76</b>

Note\* Total Cost to Respondent rate for Reporting and Recordkeeping is after 50 per cent reimbursement by FNS.

**13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not**

<sup>3</sup> <https://www.bls.gov/oes/current/oes131111.htm>

**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 and/or annualized maintenance costs associated with this burden.

**14. 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 overall total annual cost to the Federal government with fully loaded wages is \$106,187.55 which includes the (\$79,840.26 annual cost to respondents + \$26,347.29 fringe benefits). All costs incurred by State agencies in the administration of the Major Change process are reimbursed at 50 percent. The estimated annual cost to the Federal government for State agency incurred ME expense is over \$45,000. The estimated reporting expense is calculated by multiplying the total number of burden hours, 2,160 times half the cost of \$45.38 (State agencies hourly wage) which is \$22.69, per hour. In addition, it took a Program Analyst GS-11 using the 2019 Federal Salary Table 20 hours to prepare this data collection, at (\$33.45) hourly wage rate this cost is \$334.50 for a total cost of \$79,840.26.

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

This is a reinstatement, with change, of a previously approved collection for which approval has expired and is in use without OMB approval. Due to statute, FNS is still

legally required to collection this data and thereby continuing to collection in violation of the Paperwork Reduction Act. The current burden inventory for this collection collected without OMB approval is (9,664) burden hours and (112) total annual responses. FNS is requesting (3,504) burden hours and (65) total annual responses. This reflects -6,160 decrease in the total burden hours and -47 decrease in the total annual response.

Information received during the comment period and from consultations with States necessitated the change of original estimates of the time needed by States to complete the required notification reports as well as the number of States that will be required to report major changes. Thus, the total estimated burden hours associated with the Major Change requirements have been revised.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans for statistical analyses in publications.

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

This submission is not seeking OMB approval to not display the expiration date.

**18. 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.