

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-[new]:**

**Case Management and Work Notifications**

Proposed Rule: Employment and Training Opportunities in the Supplemental Nutrition Assistance Program

(RIN 0584- AE68)

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7 CFR Parts 273.7, 273.24.

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**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.**

FNS is requesting a new OMB control number. There are five parts to this information collection associated with proposed rule, Employment and Training Opportunities in the Supplemental Nutrition Assistance Program (RIN 0584- AE68). One part requires a revision to an existing information collection (SNAP Employment and Training Program activity Report; OMB Control Number: 0584-0594; Expiration Date: 09/30/2019 currently under renewal) in order to add two new data elements to the FNS 583. The other four parts of the information collection are new and do not have existing burden collections. FNS is seeking a new OMB control number for the information collection associated with this rulemaking. These changes are required by changes made by section 4005 of The Agriculture Improvement Act of 2018 (P.L. 115-334) (the Act) to the Supplemental Nutrition Assistance Program (SNAP) and are allowable under the authority granted to the Department to administer SNAP in section 4(c) of the Food and Nutrition Act of 2008.

First, the Act requires that individuals participating in E&T must be provided with case management services. Many State agencies already provide case management activities to SNAP E&T participants; however, State agencies are not currently reporting this activity to the Department and the Department is not currently collecting case management activities from these State agencies. This regulatory change will help ensure that E&T participants receive the guidance and support needed to move toward self-sufficiency. Second, the Act establishes that individuals participating in an E&T component who are determined ill-suited by the E&T provider for that component, must re-engage with the State agency to identify another type of

training or assistance. The Department proposes at 7 CFR 273.7(c)(18)(i) that individuals who have been determined ill-suited be sent a Notice of Employment and Training Participation Change (NETPC) by the State agency informing them of this determination. Developing and generating this notice will constitute a new burden for State agencies. Third, to increase State accountability for moving SNAP participants toward self-sufficiency, the Department proposes at 7 CFR 273.7(c)(11) to add two additional data elements to the FNS-583 reports (SNAP Employment and Training Program Activity Report; OMB Control Number: 0584-0594; Expiration Date: 09/30/2019 currently under renewal) to collect information on the number of SNAP participants who are required by the State agency to participate in an E&T program and of those the number who actually begin to participate in an E&T program. Fourth, the Department proposes in new paragraph 7 CFR 273.24(a)(5) to add a State agency requirement to inform every ABAWD about the ABAWD work requirement and time limit, thus creating a new State burden to develop a written statement explaining the ABAWD work requirement and time limit and to inform ABAWDs of their work requirement and time limit. Fifth, the Department proposes to add a State agency requirement at 7 CFR 273.14(b)(5) to advise SNAP households not otherwise exempt from the general work requirements in writing of available employment and training services at the time of recertification if these individuals are members of households that contain at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report. The Department notes that the proposed rule would also create a new requirement for State agencies to consult with their workforce development boards, and to explain in their E&T State plans the extent to which they will coordinate with title 1 of WIOA. Based on the existing regulatory requirement to work with their State workforce development systems, this information is already collected by the Department through the E&T

State plans and is included in an existing burden (OMB Control Number: 0584-0083; Expiration Date: 7/31/2020), as a result the new Farm Bill requirement is not expected to increase the existing burden.

## **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 will be used to better administer the Supplemental Nutrition Assistance Program (SNAP) Employment and Training Program, and provide improved customer service to SNAP E&T participants and Able-bodied Adults without Dependents (ABAWDs). First, section 4005 of the Act requires State agencies to provide case management to E&T participants, so if the Department does not require State agencies to conduct case management services, the Department will be out of compliance with Federal regulations. Second, the Act requires State agencies to respond to an ill-suited determination made by an E&T provider. If the Department does not require State agencies to send a NETPC to individuals with an ill-suited determination, the E&T participant with an ill-suited determination may not be informed that an E&T provider has made this determination. Third, the Department is adding two additional data elements related to mandatory E&T participants to the FNS-583. Existing regulations at 7 CFR 273.7(c) (9) through 7 CFR 273.7(c)(11) require State agencies to submit E&T Program Activity Reports no later than 45 days after the end of each Federal fiscal quarter. The current data elements collected as part of the FNS-583, enable the Department to gauge the number of work registrants in each State and the number of SNAP participants enrolled in E&T components. The two new data elements related to mandatory E&T participants will be required to be reported by the State

agency to the Department on the fourth quarter report. This information will enable the Department to provide improved oversight and technical assistance to State agencies to strengthen the administration of mandatory E&T programs. Fourth, the Department is adding a requirement for State agencies to develop a written statement for ABAWDs explaining their ABAWD work requirement and time limit and to inform them of their work requirement and time limit. This requirement will improve communication between the State agency and the ABAWD regarding the work requirements the ABAWD is subject to as a SNAP participant. Fifth, the Department proposes to add a State agency requirement to advise SNAP households not otherwise exempt from the general work requirements in writing of available employment and training services at the time of recertification if these individuals are members of households that contain at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report. This requirement will assist the targeted individuals in finding opportunities to move toward self-sufficiency. All burden requirements are detailed in the Burden Narrative in Appendix B.

### **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.**

The collection of information will involve the use of automated and electronic techniques. The collection of additional FNS-583 data elements will involve submission of data through the Food Program Reporting System (FPRS) (SNAP Employment and Training Program Activity Report; OMB Control Number: 0584-0594; Expiration Date: 09/30/2019 currently under renewal).

States are required to obtain e-Authorization and submit the required information to

<https://www.fprs.fns.usda.gov/home>.

The generation of the ABAWD written statement on the ABAWD work requirement and the NETPC will be sent through State-supported certification policy management information solutions (MIS) that support eligibility and client notification. The delivery of case management services by State agencies will be facilitated by State E&T MIS systems. Therefore, the Department estimates all 53 State agencies will submit the FNS 583 form electronically. Additionally, the remaining data collection from State agencies is captured in their MIS. Furthermore, the proposed rule does not require individuals/households (SNAP E&T Participants) to submit any items to the Department electronically or otherwise. To sum up, out of the entire data collection request, the Department estimates approximately 100 percent of the data collected is submitted electronically.

#### **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.**

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely monitors the SNAP E&T programs to ensure integrity and the information required for *this collection* is not currently reported by the State Agencies on a regular basis in a standardized form.

The State requirements to offer case management service to E&T participants is a new

requirement authorized in section 4005 of the Act. The Act introduced a new process whereby E&T providers identify individuals who are ill-suited for their programs, necessitating the creation of the NETPC to inform these E&T participants of their ill-suited determination. Although this rulemaking will add two new reporting elements related to mandatory E&T participants to the FNS 583, there is no duplication, as States are not required to report these elements on other forms. Once OMB approves these changes to the FNS-583, the Department will merge the updates into the SNAP Employment and Training Program activity Report, OMB Control Number: 0584-0594, Expiration Date: 09/30/2019 (currently under renewal) once the final rulemaking has been approved by OMB. There is no existing explicit requirement in the Food and Nutrition Act of 2008 or the regulations that ABAWDs receive a written statement of the ABAWD work requirement or time limit. Lastly, the requirement that the State agency advise certain zero income households of available employment and training opportunities is a new requirement authorized under Section 4005 of the Act.

**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.**

Although smaller State agencies are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other State agency. Thus, they maintain the same kinds of information on file. There are no small business' associated with this information 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.**

This is a mandatory, ongoing data collection. State agencies are required to comply with the requirements as part of their overall responsibility to properly administer the SNAP program.

This is a mandatory requirement for State agencies only and there is no penalties or adverse action taken on the individuals/households (I/H) in this data collection. The consequence to the Federal program if the collection is not conducted will be as follows:

- If the Federal government does not require States to conduct case management services, the Federal government will be in violation of Federal law.
- If the Federal government does not provide the NETPC to E&T participants with an ill-suited determination, the individual may not know they were determined ill-suited for a particular program, and ABAWDs may not know that they continue to accrue countable months. This would be in contradiction with USDA's pledge to improve customer service in all of its programs.
- If the Federal government does not collect the additional data elements on the FNS 583, the Department will be unable to provide enhanced oversight of State agency E&T programs to ensure States are operating robust programs that reasonably serve individuals required to participate in them.
- If the Federal government does not develop a written statement and inform ABAWDs of the ABAWD work requirement and time limit, ABAWDs may not be adequately informed of the steps they must engage in to maintain SNAP eligibility. This would be in contradiction with USDA's pledge to improve customer service in all of its programs.

#### **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;**
- **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. 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.**

A 60-day Federal Register Notice is embedded in the proposed rule titled “**Employment and Training Opportunities in the Supplemental Nutrition Assistance Program (SNAP) (RIN 0584-AE68).**”

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 the Department 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.**

**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.**

When the Food and Nutrition Service (FNS) finalizes an information collection package, the information is posted on the Agency webpage 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.

**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 payments of gifts are provide 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.**

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.

**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.**

This information collection does not involve the collection of any information of a sensitive nature.

**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.**

## **State Agency Reporting Activities:**

1. Case management - While many State agencies currently provide case management to SNAP E&T participants, this proposed rule would require case management services for all E&T participants. Therefore this information collection request includes full burden estimates for all State agencies and all E&T participants. The primary effect of this rule on State agencies and individual E&T participants are that that they will now be required to have regular discussions of their E&T participation and plans for self-sufficiency. The State agencies will also have to document their provision of case management services.

Based upon FY 2018 participation in E&T, the Department estimates that about 460,000 individuals will participate annually in States' E&T programs for an average of 3.27 months.

The Department estimates that the initial case management meeting will require about .5 hours and the follow-up meetings about .25 hours, or an average of 0.326 hours per meeting ( $(0.5 \text{ hours} + 0.25 \text{ hours} + 0.25 \text{ hours} + 0.0676 \text{ hours}) / 3.27 \text{ months} = 0.326$ ).

The overall estimate burden for providing case management services is 490,367 total burden hours and 1,504,193 annual responses.

The Department estimates that documenting case management services will require about 0.08 hours per response.

2. Notice Employment and Training Participation Change - The proposed rule would require the State agency to send a notice to every household with an individual who has been determined ill-suited for an E&T component by an E&T provider, informing the individual of this determination. Each State agency would have to develop a Notice of Employment and Participation Change (NETPC). The Department estimates it will take each State agency approximately 24 hours to develop the NETPC. In addition, each State agency would have to generate the NETPC to send to affected SNAP participants. Based upon FY 2018 participation in E&T, the Department estimates that about 460,000 individuals will participate annually in States' E&T programs. Of those, approximately 10 percent or 46,000 individuals will receive a determination of ill-suited by an E&T provider. The Department estimates it will take a State agency approximately 2 minutes (0.0334 hours) to generate the NETPC.

The total annual burden hours for each State agency to develop the NETPC is 1,272 hours (53 State agencies x 24 hours = 1,272 hours), or approximately 24 hours per State agency respondent (1,272 hours ÷ 53 State agencies = 24 hours per State agency).

The total annual burden for for generating the NETPC for every E&T participant with an ill-suited determination is approximately 1,537 hours (46,000 E&T participants with an ill-suited determination x 0.0334 hours = 1,537 hours), or approximately 28.93 hours per State agency respondent (1,537 hours ÷ 53 State agencies = 28.93hours per State agency).

3. New elements on the FNS 583 - State agencies must already prepare data for the FNS 583 form. FNS is proposing in this rulemaking to add two additional reporting elements to the FNS-583: 1) The number of SNAP participants who were required by the State agency to participate in E&T; and 2) of those the number who participated in E&T. This information would be collected on an annual basis.

In FY 2018 (the last year for which the Department has complete data), 17 State agencies had mandatory E&T programs in at least part of their State for some SNAP participants. The Department estimates based on State-reported data in the FY 2018 State E&T plans of the number of expected E&T participants that in these States 2,856,580 participants were required to participate in E&T. The Department estimates it will take each State agency 10 seconds (0.0028 hours) to compile and record the number of SNAP participants who are required to participate in E&T.

The total annual burden for reporting number of SNAP participants required to participate in E&T is approximately 7998.4 hours (2,856,580 required mandatory participants x 0.0028 hours = 7998.4 hours), or approximately 470.49 hours per State agency respondent (7998.4 hours ÷ 17 State agencies = 470.49 hours per State agency) or 470.49 hours per response (470.49 hours ÷ 1 response per State agency = 470.49 hours per response).

Of these 2,856,580 participants, the Department estimates based on State-reported data in the FY 2018 annual reports 282,060 participated in at least one component in FY 2018.

The Department estimates it will take each State agency 10 seconds (0.0028 hours) to compile and record the number of mandatory E&T participants who participated in E&T.

The total annual burden for reporting the actual number of mandatory E&T participants is approximately 789.8 hours (282,060 actual mandatory participants x 0.0028 hours = 789.8 hours), or approximately 46.46 hours per State agency respondent (789.9 hours ÷ 17 State agencies = 46.46 hours per State agency) or 46.46 hours per response (46.46 hours ÷ 1 responses per State agency = 46.46 hours per response).

4. Informing ABAWDs of the ABAWD work requirement and time limit. The Department proposes to add a State agency requirement to inform every ABAWD about the ABAWD work requirement and time limit. The Department estimates approximately 2,028,999 ABAWD participants in FY 2021, based on adjustments to account for individuals expected to lose eligibility as a result of recently-finalized rules related to geographic waivers of the ABAWD time limit. The Department estimates it will take each State agency 2 minutes (0.0334 hours) to inform each ABAWD about the ABAWD work requirement and time limit.

The total annual burden for developing the written statement informing ABAWDs of the ABAWD work requirement and time limit is approximately 1,272 hours (53 State agencies x 24 hours = 1,272 hours), or approximately 24 hours per State agency (1,272 hours ÷ 53 State agencies = 24 hours).



The total annual burden for informing ABAWDs of the ABAWD work requirement and time limit is approximately 67,769 hours (2,028,999 ABAWDs x 0.0334 hours = 67,769 hours), or approximately 1,278.7 hours per State agency respondent (67,769 hours ÷ 53 State agencies = 1,278.7 hours per State agency).

5. Advising certain households of the employment and training services. The Department proposes to add a State agency requirement to advise SNAP households not otherwise exempt from the general work requirements in writing of available employment and training opportunities at the time of recertification if these individuals are members of households that contain at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report.

The total annual burden to State agencies to develop the list of employment and training services is 1,272 hours (53 State agencies x 24 hours = 1,272 hours), or approximately 24 hours per State agency (1,272 hours ÷ 53 State agencies = 24 hours).

#### **Individuals/Households Burden Activities:**

1. Based upon FY 2018 participation in E&T, the Department estimates that about 460,000 individuals will participate annually in States' E&T programs for an average of 3.27 months, thus 460,000 individuals will require case management.

The Department assumes that most (90 percent) of case management meetings will be telephonic with only about 10 percent face-to-face and consequently requiring the

participant to travel to a State office adding one hour to the average meeting time (i.e. 1.326 hours). For this reason, the average meeting time per participant will be 0.426 hours per meeting ( $[0.326*0.90] + [1.326*0.10] = 0.426$ ).

The overall estimates burden is 640,789 total burden hours and 1,504,200 annual responses.

2. 7 CFR 273.7(c)(18)(i). SNAP E&T participants who receive an ill-suited determination will receive a NETPC from the State and must read that notice. The Department estimates that approximately 46,000 participants will receive that notice.

The total annual burden to participants to read the NETPC is 920 hours (46,000 participants x 0.02 hours = 920 hours), or approximately 0.02 hours per participant (920 hours ÷ 46,000 participants = 0.02 hours).

The overall total estimate burden for reading the NETPC is 920 total burden hours and 46,000 annual responses.

3. 7 CFR 273.7(a)(5). State agencies will be required to provide ABAWDs with a written statement of their ABAWD work requirement and time limit. The Departments estimates approximately 2,028,999 ABAWDs will receive and read this written statement.

The total annual burden to participants to read the written statement is 40,580 hours (2,028,999 participants x 0.02 hours = 40,580 hours), or approximately 0.02 hours per participant (40,580 hours ÷ 2,028,999 participants = 0.02 hours).

The overall total estimate burden for reading the written statement is 40,580 total burden hours and 2,028,999 annual responses.

4. 7 CFR 273.14(b)(5). State agencies will be required to advise SNAP households not otherwise exempt from the general work requirements in writing of available employment and training opportunities at the time of recertification if these individuals are members of households that contain at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report. The Department estimates approximately 5,496,00 participants will receive and read this list.

The total annual burden to participants to read the list is 109,920 hours (5,496,000 participants x 0.02 hours = 109,920 hours), or approximately 0.02 hours per participant (109,920 hours ÷ 5,496,000 participants = 0.02 hours).

The overall total estimate burden for reading the list is 109,920 total burden hours and 5,496,000 annual responses.

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

1. Case management - The overall estimates burden for the State to provide case

management is 490,367 total burden hours and 1,504,193 annual responses. Assuming an hourly wage rate of \$30.12 for an E&T case manager (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 21-1029), the total estimated cost to the State agency is \$14,769,852.

The overall estimate burden for documenting case management services is 120,335 total burden hours and 1,504,193 annual responses. Assuming an hourly wage rate of \$30.12 for an E&T case manager (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 21-1029), the total estimated cost to the State agency is \$3,624,503.

The Department also estimates a cost for the Individuals/ who participate in case management. The overall estimates burden is 640,789 total burden hours and 1,504,200 annual responses. Assuming an hourly wage rate of \$7.25 for an individual E&T participant (Federal minimum wage), the total estimated cost to E&T participants is \$4,645,720.

2. Notice of Employment and Training Participation Change - The overall estimate burden to develop the NETPC is 1,272 burden hours and 53 annual responses. Assuming an hourly wage rate of \$18.02 for a State eligibility worker (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$22,921.

The overall estimates burden for generating the NETPC is 1,537 total burden hours and

46,004 annual responses. Assuming an hourly wage rate of \$22.34 for a State eligibility worker (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 43-4061), the total estimated cost to the State agency is \$34,326.

The Department also estimates a cost for the Individuals to read the NETPC. The overall total estimate burden for reading the NETPC is 920 total burden hours and 46,000 annual responses. Assuming an hourly wage rate of \$7.25 for an individual E&T participant (Federal minimum wage), the total estimated cost to E&T participants is \$6,670.

3. New elements on the FNS-583 - The overall estimates burden is 8788 total burden hours and 17 annual responses. Assuming an hourly wage rate of \$18.02 for a State agency administrative staff member (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$158,364.
4. ABAWD written statement - The overall total estimate burden for developing the ABAWD written statement is 1,272 hours total burden hours and 53 annual responses. Assuming an hourly wage rate of \$18.02 for a State eligibility worker (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$22,921.

The overall estimate burden for informing ABAWDs of the ABAWD work requirement and time limit is 67,769 total burden hours and 2,028,000 annual responses. Assuming an

hourly wage rate of \$22.34 for a State eligibility worker (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 43-4061), the total estimated cost to the State agency is \$1,513,950.

The Department also estimates a burden to participants to read the written statement. The overall total estimate burden for reading the written statement is 40,580 total burden hours and 2,028,999 annual responses. Assuming an hourly wage rate of \$7.25 for an individual E&T participant (Federal minimum wage), the total estimated cost to E&T participants is \$294,205.

5. Advisement of employment and training services – The overall total estimate burden for developing the list of employment and training services is 1,272 total burden hours and 53 annual responses. Assuming an hourly wage rate of \$18.02 for a State eligibility worker (Bureau of Labor Statistics May 2018 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$22,921.

The Department also estimates a burden to participants to read the list. The overall total estimate burden for reading the list is 109,920 total burden hours and 5,496,000 annual responses. Assuming an hourly wage rate of \$7.25 for an individual E&T participant (Federal minimum wage), the total estimated cost to E&T participants is \$796,920.

The basic recordkeeping requirement for household case file documentation is part of OMB Control Number: 0584-0064; Expiration Date 07/31/2020. FNS will add additional burden

to this collection to accommodate the increased burden resulting from providing case management to E&T participants. The recordkeeping burden for the FNS 583 is already sufficient as documented in OMB Control Number: 0584-0339; Expiration Date: 01/31/2021. FNS intends to merge this updated reporting burden estimates into 0584-0594; Expiration Date: 09/30/2019 (currently going through renewal at the agency) and 0584-0064, once the final rulemaking information collection request is approved.

**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.**

By law, the Federal government reimburses State agencies 50 percent of their SNAP administrative costs. The Department estimates States will incur \$20,169,755 in State administrative costs as part of this information collection. The cost to the Federal government for an analyst (GS 12, step 6) to draft this data collection and for a supervisor (GS 14, step 1) to review equals \$617.69 ((12 hrs x \$46.78/hr) + (1 hr x \$56.34/hr)). Thus, the total cost to Federal government is \$10,085,494.

**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.**

Although we are revising the FNS 583, FNS is requesting a new OMB control number for this information collection, for 0584-AE68 (Employment and Training Opportunities in the Supplemental Nutrition Assistance Program (SNAP)). FNS is requesting 1,484,820 burden hours and 14,158,764 total annual responses for this information collection to OMB burden inventory. In addition to new requirements, we are only adding the time it will take for the new additional reporting requirements for the FNS 583 and not the already approved time it currently takes to complete the FNS 583. The requirements associated with the FNS 583 will be merged back into the primary OMB Control Number: 0584-0594; Expiration Date: 09/30/2019 (currently under agency renewal). This information is delineated in the Appendix 3 AE68 Burden Estimates.

**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.**

The results of this information collection will not be published.

**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 the revised FNS-583 form. For the State agency notice sent to E&T participants with an ill-suited determination (the NETPC), the State supplied written statement regarding ABAWD work requirements, and the list of employment and training services provided to certain types of households, the Department



seeks approval to not display the OMB control number. While providing the NETPC, written statement, and list would be required by each State SNAP agency once the proposed rule is finalized, each State agency develops its own notices and written statements to implement Federal requirements. State agencies would not need to display an OMB control number on these documents. There are no forms or materials required to be produced by State agencies to conform with the case management requirement.

**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 for this information collection.