

APPENDIX 2: BURDEN NARRATIVE FOR RIN-0584-AE68 Employment and Training Opportunities Proposed Rule

Estimate of the Information Collection Burden for Case Management and Work Notification (OMB #0584-NEW)

This document explains the calculation of the information collection burden for Employment and Training Opportunities Proposed Rule in the Supplemental Nutrition Assistance Program (SNAP) under OMB #0584-NEW.

REPORTING REQUIREMENTS

AFFECTED PUBLIC: 53 STATE AGENCIES (159 State employees)

1. 7 CFR 273.7(c)(1) - 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 monthly 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. 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 Department estimates that documenting case management services will require about 0.08 hours per response.

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.

APPENDIX 2: BURDEN NARRATIVE FOR RIN-0584-AE68 Employment and Training Opportunities Proposed Rule

- 7 CFR 273.7(c)(18)(i) - 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 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 total annual burden 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 = 29 hours per State agency).

The overall estimate 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.

- 7 CFR 273.7(c)(11) - 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 new information would be collected on an annual basis. The current FNS-583 reporting elements are undergoing a separate revision with OMB control

APPENDIX 2: BURDEN NARRATIVE FOR RIN-0584-AE68 Employment and Training Opportunities Proposed Rule

number: 0584-0594; Expiration Date: 9/30/19 (currently going through agency revisions); FNS is not seeking approval for these burden estimates in the request.

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 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 7,998.4 hours (2,856,580 required mandatory participants x 0.0028 hours = 7,998.4 hours), or approximately 470.5 hours per State agency respondent (7,998.4 hours ÷ 17 State agencies = 470.5 hours per State agency) or 470.5 hours per response (470.5 hours ÷ 1 responses per State agency = 470.5 hours per response).

Of these 2,856,580 participants, the Department estimates based on State-reported data in the FY 2018 annual reports that 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 46.5 hours per State agency respondent (789.9 hours ÷ 17 State agencies = 46.5 hours per State agency) or 46.5 hours per response (46.5 hours ÷ 1 responses per State agency = 46.5 hours per response).

The overall estimates burden is 8,788 total burden hours and 3,138,660 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 State agencies is \$158,364.

4. 7 CFR 273.7(a)(5) - The Department proposes to add a State agency requirement to inform every ABAWD about the ABAWD work requirement and time limit. The State agency must develop a written statement informing the ABAWDs of 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

APPENDIX 2: BURDEN NARRATIVE FOR RIN-0584-AE68 Employment and Training Opportunities Proposed Rule

Department estimates it will take each State agency 24 hours to develop the written statement informing ABAWDs of their work requirement. 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 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 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).

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.

5. 7 CFR 273.14(b)(5). 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.

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).

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.

APPENDIX 2: BURDEN NARRATIVE FOR RIN-0584-AE68 Employment and Training Opportunities Proposed Rule

AFFECTED PUBLIC: 460,000 INDIVIDUALS/HOUSEHOLDS

6. 7CFR 273.7(c)(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. 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.

7. 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. 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.

8. 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 Department 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).

APPENDIX 2: BURDEN NARRATIVE FOR RIN-0584-AE68 Employment and Training Opportunities Proposed Rule

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.

9. 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. 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.

RECORDKEEPING REQUIREMENTS

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.

THIRD PARTY DISCLOSURE REQUIREMENTS

There are no third party disclosure requirements for this proposed regulation.