

SUPPORTING STATEMENT - for
OMB Control Number 0584-0479:
Supplemental Nutrition Assistance Program (SNAP):
Waivers under Section 6(o) of the Food and Nutrition Act

Final Rule: Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied

Adults Without Dependents (RIN 0584-AE57)

7 CFR Part 273

Arpan Dasgupta, Project Officer

Supplemental Nutrition Assistance Program

Program Development Division, Certification Policy Branch

Food and Nutrition Service, USDA

3101 Park Center Drive, Room 812

Alexandria, VA 22302

Phone: 703-305-2222

SNAPCPBrules@usda.gov

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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.

This is a revision of a currently approved information collection based on rulemaking requirements of the final rule titled, Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents (RIN 0584-AE57). This final rule revises the conditions under which USDA would waive, when requested by States, the able-bodied adult without dependents (ABAWD) time limit in areas that have an unemployment rate of over 10 percent or a lack of sufficient jobs. In addition, the rule limits carryover of ABAWD discretionary exemptions, however there is not a burden associated with this change.

Section 6 (o) of the Food and Nutrition Act of 2008, (the Act, as amended through P.L. 113-128), limits the amount of time an ABAWD can receive Supplemental Nutrition Assistance Program (SNAP) benefits to 3 months in a 36-month period (the time limit), unless the individual is working and/or participating in a work program at least 80 hours per month, or participating in workfare. The Act exempts individuals from the time limit for several reasons, including age, unfitness for work, or having a dependent child. ABAWDs must also meet the general work requirements.

The Act provides State agencies with flexibility to request a waiver of this time limit if an area has an unemployment rate of over 10 percent or a lack of sufficient jobs. If the time limit is waived, individuals are not required to meet the ABAWD work requirement in order to receive SNAP for more than 3 months in a 36-month period. However, even if the time limit is waived,

ABAWDs remain subject to the general work requirements, as ABAWDs are work registrants, and the general work requirements cannot be waived.

This collection of information is necessary in order for FNS to perform its statutory obligation to review waivers of the SNAP ABAWD time limit.

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.

State agencies must submit a formal waiver request of the ABAWD time limit to FNS for approval. These waiver requests must contain acceptable forms of supporting evidence, labor market data, or other information that justifies the State agency's claim. State agencies may submit their completed waiver requests and accompanying information by either mail or e-mail to their respective FNS Regional Office, which will in turn submit the waiver request to the FNS National Office for approval. Each State agency that wishes to continue to have waived areas within its State will need to submit a waiver request and supporting information at least once per year. The majority of employment data and labor market information that accompany these waiver requests are readily available through other federal agencies.

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.

Although FNS is committed to complying with the E-Government (E-Gov) Act, 2002, FNS

currently does not use any electronic systems or web-based forms to collect the waivers from the State agencies. FNS provides funding to support the development of electronic systems through Federal matching of States' administrative costs. State agencies have the authority to use information technology that best suits the needs of their individual or unique systems of operation to comply with the information collection and reporting requirements contained in this submission. Currently, State agencies submit ABAWD waiver requests and accompanying information via e-mail, and in return, FNS transmits approvals and denials of waiver requests via e-mail.

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.

Every effort has been made to avoid duplication. FNS is solely responsible for determining if ABAWD waiver requests from State agencies comply with Federal law. Although State agencies frequently submit ABAWD time limit waiver requests with accompanying data from the Bureau of Labor Statistics (BLS), States may provide other data sources to justify their waiver requests in limited circumstances.

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.

State agencies are involved in the administration of SNAP at the State level. All State agencies deliver the same program benefits and perform the same function regardless of population size. This information collection does not have a direct impact on any small entities. Out of 53 State agencies, none are considered small entities.

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 an ongoing information collection request. If this collection is not conducted, FNS will be unable to perform its statutory duty under Section 6(o) of the Act to review State agency waivers requests of the ABAWD time limit. As required by 7 CFR 273.24, State agencies may generally submit ABAWD waiver requests with supporting data once a year, which limits the ability to collect this information less frequently.

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 that cause this information collection to be conducted in a manner that is inconsistent with 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.

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.

On February 1, 2019, FNS published a notice in the Federal Register ([83 FR 980](#)) soliciting public comments on the changes to this information collection that would result from adoption of the accompanying rule. While FNS did not receive any comments that directly addressed the approved activities in this collection, some commenters noted that adoption of this rule may increase administrative burden for States.

Some commenters noted that once the rule is implemented, State agencies will experience an increased burden to implement the time limit to more ABAWDs because fewer areas will qualify for a waiver of the ABAWD time limit. FNS agrees with the comments and acknowledges verification of ABAWD work hours and additional issuance of Notices of Adverse Action (NOAAs) will increase burden and add a start-up cost associated with the final rulemaking.

One commenter noted that the requirement that the waiver request “be endorsed by the State’s

governor,” could create an additional burden. The Department is adjusting the proposed language in in the final rule to, “with the support of the chief executive officer of the State,” in order to more closely match the language from the 2018 Farm Bill. FNS agrees with this comment that the requirement could create an additional burden. FNS is increasing the burden associated with the submission of waiver request to account for this new requirement to seek the support of the chief executive of the State.

Some comments also noted that State agencies may experience other increased burdens due to adoption of this rule, such as preparing eligibility systems, providing additional training to agency employees, and developing other resources to guide implementation. FNS does not find these comments compelling; this rule did not change the basic responsibility of State agencies to ensure that they have the necessary staff, systems, or other resources to implement the ABAWD time limit if an ABAWD waiver was discontinued.

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 or gifts are provided to respondents under this collection.

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.

FNS does not offer any assurance of confidentiality to the respondents.

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.

No private or sensitive questions will be asked.

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.

The estimated reporting burden for each individual component of this information collection, including number of respondents, frequency of response, average time to respond and annual burden hours is described here and shown below.

Reporting Burden

First Year (Start-Up Burden)

The reduction of areas waived because of this final rule will subject more individuals to the ABAWD time limit. FNS estimates implementation of the final rule will create a start-up burden of 170,229 hours for State agencies and SNAP households. The burden is a result of the requirement to submit additional waiver requests in a 12-month period, verifying work hours, and issuing notices of adverse action. The revised burden estimates in the final rule also include the burden to SNAP households for receiving notices of adverse action and verifying work

hours.

State Agencies

The ABAWD waiver request process includes collection of data, analysis of data, and preparing and submitting a request. The final rule establishes clear limitations under which waivers can be requested; In particular, the Department is codifying a strict definition of an “area in which the individuals reside” for purposes of a geographic area covered by a waiver. Generally, State agencies will only be able to receive waiver approval for areas defined as Labor Market Areas (LMAs). As a result, the Department has estimated a reduction in burden hours for State agencies to submit each waiver request. Based on the experience of FNS during calendar year 2018, FNS projects that 36 out of 53 State agencies will submit requests for a waiver of the time limit for ABAWD recipients based on a high unemployment rate or lack of sufficient number of jobs. State agencies typically only submit one waiver request in each 12-month period; however, the implementation timeline for the final rule will require State agencies that wish to continue waivers for FY 2020 to submit an additional waiver request.

FNS estimated 28 hours to submit a waiver request based on labor market data, which require detailed analysis of labor markets. FNS maintains this estimate as a basis for the final rule. The final rule requires States seek support of the chief executive officer of the State. The rule is not prescriptive about the process and, as a result, State agencies can meet this requirement in a range of ways. Because some State agencies may spend a few minutes while others may spend an hour to two, FNS estimates this burden will result, on average, in an additional 30 minutes per ABAWD waiver request. FNS is also adding 120 hours for each State to reflect the time

associated with understanding the new regulations and preparing the initial waiver based on the revised regulations. FNS now estimates most State agencies will require 148.5 hours to submit an ABAWD waiver requests based on labor market data. This represents an additional start-up burden of 5,346 hours for State agencies collectively.

The policy choices made in the final rule do not allow States to use Labor Surplus Areas (LSA) as a basis for requests. A designation as a LSA was not an allowable criterion for a waiver approval in the proposed rule. The burden associated with waivers based on a LSA designation will be removed.

The final rule will result in an estimated 1,087,000 additional ABAWDs to live in unwaived areas. The Department estimates the vast majority, approximately 688,000, will not meet the work requirement. As a result, it is estimated that State agencies will have to issue NOAAs to those 688,000 ABAWDs who do not meet the work requirement. While the issuance of NOAAs is currently approved under OMB #0584-0064, it is estimated these 688,000 NOAAs will be considered a start-up activity upon implementation of this final rule. FNS used existing estimates from the approved OMB # 0584-0064 as a basis to determine it would take each State agency approximately 4 minutes to issue a NOAA. Although issuing notices are part of normal State administrative procedures, FNS is increasing the burden to account for responding to households that have questions about why their benefits are ending as a result of this final rule. In general FNS used the existing collection as a starting point but has reestimated in instances where those estimates were not adequate. Therefore, FNS estimates 45,867 hours for this one-time activity.

FNS also estimates 399,000 will meet the work requirement or be exempt from the time limit. As a result, State agencies will have to verify work hours and exemptions for 399,000 ABAWDs that meet the work requirement or are exempt. FNS used existing estimates from the approved OMB # 0584-0064 as a basis to determine the verification of work hours and exemptions will take approximately 5 minutes for each verification because it did not adequately capture the time needed to ensure the verifications that are provided are sufficient. While the activities related to verification are currently approved under OMB #0584-0064, it is estimated these 399,000 verifications will be considered a start-up activity upon implementation of this final rule. Therefore, FNS estimates 33,250 start-up burden hours for State agency verification of work hours and exemptions. These two activities collectively, the issuance of NOAAs and the verification of work hours and exemptions, account for 79,117 hours. The total start-up burden for State agencies, including the additional waiver request submission, will result in 84,463 hours.

Households

1,078,000 additional ABAWDs will live in unwaived areas and will face a start-up burden as well. FNS estimates 688,000 ABAWDs will not meet the work requirement and receive a NOAA. While the issuance of NOAAs is currently approved under OMB #0584-0064, it is estimated the reading of these 688,000 NOAAs will be considered a start-up activity upon implementation of this final rule. FNS used existing estimates from the approved OMB # 0584-0064 as a basis to determine it would take each household 4 minutes to read a NOAA. Therefore, FNS estimates 45,867 burden hours for SNAP households for this start-up activity.

FNS estimates 399,000 will meet the work requirement. ABAWDs meeting the work requirement will have to respond to State agency request for verification of work hours. FNS used existing estimates from the approved OMB # 0584-0064 as a basis to determine the response to State agency request for verification of work hours and exemptions will take the SNAP household approximately 6 minutes for each verification. While the activities related to household response to request for State agency verification are currently approved under OMB #0584-0064, it is estimated these 399,000 verifications will be considered a start-up activity upon implementation of this final rule. Therefore, FNS estimates 39,900 start-up burden hours for State agency verification of work hours and exemptions. These two start-up burdens will result in an increase of 85,767 hours for SNAP households.

The time burdens and costs associated with these activities are presented in the table below.

Ongoing Burden

FNS projects that 36 out of 53 State agencies will submit requests for a waiver of the time limit for ABAWDs. In the currently approved information collection for OMB Control #0584-0479, FNS estimates it takes 35 hours for each State agency to submit a waiver request. In the proposed rule, FNS estimated 28 hours to submit a waiver request based on labor market data. FNS maintains this estimate as a basis for the final rule.

The final rule requires States seek support of the chief executive officer of the State. The rule is not prescriptive about the process and, as a result, State agencies can meet this requirement in a range of ways. Because some State agencies may spend a few minutes while others may spend

an hour to two, FNS estimates this burden will result, on average, in an additional 30 minutes per ABAWD waiver request. FNS now estimates most State agencies will require 28.5 hours to submit an ABAWD waiver requests based on labor market data. While this represents a reduction in general, it represents an increase in burden for States using the LSA criterion as the basis for a request.

The final rule establishes clear limitations under which waivers can be requested; In particular, the Department is codifying a strict definition of an “area in which the individuals reside” for purposes of a geographic area covered by a waiver. Generally, State agencies will only be able to receive waiver approval for areas defined as Labor Market Areas (LMAs). FNS is estimating a reduction in burden hours. Based on the final rule, FNS now projects a reduction of 172 hours, for a total of 1,026 annual burden hours compared to 1198 hours previously approved.

There are no recordkeeping or public disclosure burdens for this information collection request.

OMB # 0584-0479	Requirement and Citation	Estimated # Respondents	Response annually per respondent	Total Annual Responses	Hours Per Response	Annual Burden Hours	Previous Submission Total Hours	Differences Due to Program Changes	Differences Due to Adjustment	Hourly Wage Rate	Estimated Cost to Respondents
Affected Public: State Agencies											
Start-Up	7 CFR 2(f) (1)&(2) - Additional one-time verification of hours worked and exemptions for ABAWDs newly subject to the work requirement	36	11,083	399,000	0.08	33,250	0	33,250	0	\$32.01	\$1,064,332.50
	7 CFR 273.13(a) - One-time Issuance of Notice of Adverse Action to ABAWDs who do not meet the work requirement	36	19,111	688,000	0.07	45,867	0	45,867	0	\$32.01	\$1,468,192.00

	7 CFR 273.24(f) - One-time Submission of waiver request based on labor market data	36	1	36	148.5	5,346	0	5,346	0	\$32.01/\$45.45	\$229,897.97
	7 CFR 273.24 (f) - One-time Submission of waiver request based on Labor Surplus Area designation	0	0	0	0	0	0	0	0	\$32.01/\$45.45	\$0.00
Ongoing	7 CFR 273.24(f) - Submission of waiver request based on labor market data	36	1	36	28.5	1,026	1190	-164	0	\$32.01/\$45.45	\$33,570.82
	7 CFR 273.24 (f) - Submission of waiver request based on Labor Surplus Area designation	0	0	0	0	0	8	-8	0	\$32.01/\$45.45	\$0.00
Reporting Totals		36		1,087,072	0.08	85,489	1198	84,291	0	-	\$2,795,993.30
Affected Public: Households											
Start-Up	7 CFR 2(f) (1)&(2) - One Time - respond to verification of hours worked	399,000	1	399,000	0.1	39,900	0	39,900	0	\$7.25	\$289,275.00
	7 CFR 273.13(a) - One-time Review of Notice of Adverse Action	688,000	1	688,000	0.07	45,867	0	45,867	0	\$7.25	\$332,533.33
Reporting Totals		1,087,000		1,087,000	0.08	85,767	0	85,767	0	-	\$621,808.33
Total Reporting Burden											
Total Reporting Burden		1,087,036		2,174,072	0.08	171,255	1198	170,057	0	-	\$3,417,801.63

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

The information collection requirements described are imposed on State agencies and households.

The wage rate used in determining the burden for households was based on the Department Labor (DOL) federal minimum wage, which is \$7.25.

The wage rates used in determining State agency costs were based on the Bureau of Labor and Statistics (BLS) Occupational Employment Statistics estimates, which indicate a mean hourly wage of \$24.07 per hour for Miscellaneous Community and Social Services Specialists¹ (State staff) and a mean hourly wage of \$34.17 for Social and Community Service Managers² (State Managers). However, 50 percent of the administrative costs incurred by State agencies are reimbursed by FNS. The estimated cost to respondents for each individual component of this information collection, including the number of respondents and annual hour burden is shown and described below:

¹ https://www.bls.gov/oes/current/naics4_999200.htm#13-0000

² <https://www.bls.gov/oes/current/oes119151.htm>

OMB # 0584-0479	Requirement and Citation	Hourly Wage Rate ³	Annual Burden Hours	Cost (US\$) (approx.)
Affected Public: State Agencies				
Start-Up	7 CFR 2(f)(1)&(2) - Additional one-time verification of hours worked and exemptions for additional ABAWDs living in unwaived areas	\$32.01	33,250	\$1,064,332.50
	7 CFR 273.13(a) - One-time Issuance of Notice of Adverse Action to ABAWDs who do not meet the work requirement	\$32.01	45,867	\$1,468,192.00
	7 CFR 273.24(f) - One-time Submission of waiver request based on labor market data	\$32.01/\$45.45	5,346	\$229,897.97
	7 CFR 273.24 (f) - One-time Submission of waiver request based on Labor Surplus Area designation	0	0	0
Ongoing	7 CFR 273.24(f) - Submission of waiver request based on labor market data	\$32.01/\$45.45	1,026	\$33,570.82
	7 CFR 273.24 (f) - Submission of waiver request based on Labor Surplus Area designation	0	0	0
State Agency Total		-	85,489	\$2,795,993.30
Affected Public: Households				
Start-Up	7 CFR 2(f)(1)&(2) - One Time - respond to verification of hours worked	\$7.25	39,900	\$289,275.00
	7 CFR 273.13(a) - One-time Review of Notice of Adverse Action	\$7.25	45,867	\$332,533.33
Total Household Cost		-	85,767	\$621,808.33
Total Cost				\$3,417,801.63

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

³ Base BLS wages have been adjusted by 33% to reflect fringe benefits

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 or 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.

FNS estimates the following Federal costs at \$35,020.03 annually, based on 8 hours review and analysis by a Program Analyst (GS-13/1), 2 hour review by a Branch Chief (GS-14/1)⁴, and reimbursement of 50% of State Administrative costs. The calculations for this cost are described in the table below:

	Review of State ABAWD Waiver Requests	Annual Responses	Hours	Hourly Wage Rate⁵	Cost (US\$) (approx.)
Start-Up	Program Analyst (GS-13/1)	36	8	\$48.88	** Expression is faulty **72
	Branch Chief (GS-14/1)	36	2	\$57.75	** Expression is faulty **
Ongoing	Program Analyst (GS-13/1)	36	8	\$48.88	** Expression is faulty **72
	Branch Chief (GS-14/1)	36	2	\$57.75	** Expression is faulty **
Federal Share of State Administrative Costs					\$1,397,996.65
Total Annualized Federal Cost					\$1,434,465.89

⁴ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx

⁵Base wages have been increased by 33% to reflect fringe benefits

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.

This is a revision of a currently approved collection based on a final rule. The current OMB burden inventory is 1,198 and 36 total annual responses. FNS is requesting 171,255 total burden annual hours and 2,174,072 total annual responses, an increase of 170,058 burden hours and 2,174,036 responses. This increase in burden hours and responses is largely due to the one-time startup activities associated with implementing the rule.

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.

There are no plans to publish statistical analyses.

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 all instruments.

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 to the certification statement.