

APPENDIX C

BURDEN NARRATIVE OMB CONTROL NUMBER: 0584-0587

STATE AGENCIES (53)

REPORTING BURDEN:

1. Under 274.6(b)(5), **Withhold Replacement Card Warning Notice and Replacement Card Withheld Notice** –State agencies may require an individual member of a household to provide an explanation in cases where the number of requests for card replacements is determined excessive. The State agency must notify the household in writing when it has reached the threshold, indicating that the next request for card replacement will require the client to contact the State agency to provide an explanation for the requests, before the replacement card will be issued. The State agency must also notify the household in writing once the threshold has been exceeded and the State agency is withholding the card until contact is made. FNS estimates 6 State agencies will submit 4,404.03 total annual reports/notices which will generate 26,424.20 total annual responses/notices; it will take approximately 2 minutes (0.0334 minutes) to generate this activity/notice which provides a total annual burden estimate of 882.56 burden hours for this activity.

Replacement Card Withheld Notice –State agencies may require an individual member of a household to provide an FNS estimates 6 State agencies will submit 2,202.02 total annual reports/notices which will generate 13,212.10 total annual responses/notices; it will take approximately 2 minutes (0.0334 minutes) to generate this activity/notice which provides a total annual burden estimate of 441.28 burden hours for this activity.

2. Under 274.6(b)(6), **Excessive Replacement Card Notice** –State agencies must monitor all client requests for EBT card replacements and send a notice, upon the fourth request in a 12-month period, alerting the household that their account is being monitored for potential, suspicious activity. The State agency shall be exempt from sending the Excessive Replacement Card Notice if they have chosen to exercise the option to withhold the replacement card until contact is made with the State agency in accordance with 274.6(b)(5) and the State agency has chosen to use the minimum threshold, which requires sending the first notice on the fourth card replacement request within 12 months. FNS estimates 47 state agencies will submit 4,515.31 annual reports/notices which will generate 212,219.8 total annual responses/notices; it will take approximately 2 minutes (0.0334 minutes) to generate this activity/notice which provides a total annual burden estimate of 7,088.14 burden hours for this activity.

INDIVIDUALS/HOUSEHOLDS SNAP PARTICIPANTS (238,644)

REPORTING BURDEN:

1. Under 274.6(b)(5), Reading **Withhold Replacement Card Warning Notice** –State agencies may require an individual member of a household to provide an explanation in cases where the number of requests for card replacements is determined excessive. The State agency must notify the household in writing when it has reached the threshold, indicating that the next request for card replacement will require the client to contact the State agency to provide an explanation for the requests, before the replacement card will be issued. The State agency must also notify the household in writing once the threshold has been exceeded and the State agency is withholding the card until contact is made. FNS estimates 26,424.20 Individuals/Households will received and read 1 notice annually which will generate 26,424.20 total annual responses/notices; it will take approximately 2 minutes (0.0334 minutes) to read the notice which provides a total annual burden estimate of 882.56 burden hours for this activity.
2. Under 274.6(b)(5), **Reading Replacement Card Withheld Notice and Making Initial Contact with State Agency** -- State agencies may require an individual member of a household to provide an explanation in cases where the number of requests for card replacements is determined excessive. The State agency must notify the household in writing when it has reached the threshold, indicating that the next request for card replacement will require the client to contact the State agency to provide an explanation for the requests, before the replacement card will be issued. The State agency must also notify the household in writing once the threshold has been exceeded and the State agency is withholding the card until contact is made. Out of the 26,424.20 Individuals/Households already contacted, FNS estimates 13,212.1 Individuals/Households will receive and read 1 notice and then make contact with the State Agency annually which will generate 13,212.10 responses/notices; it will take approximately 30 minutes (0.5 minutes) to read the responses/notices which provides a total annual burden estimate of 6,606.05 burden hours for this activity.
3. Under 274.6(b)(6), **Reading Excessive Replacement Card Notice** -- State agencies may require an individual member of a household to provide an explanation in cases where the number of requests for card replacements is determined excessive. The State agency must notify the household in writing when it has reached the threshold, indicating that the next request for card replacement will require the client to contact the State agency to provide an explanation for the requests, before the replacement card will be issued. The State agency must also notify the household in writing once the threshold has been exceeded and the State agency is withholding the card until contact is made. FNS estimates 212,219.80 Individuals/Households will receive and read 1 excessive replacement card notice from the State Agency annually which will generate 212,219.8 responses/notices; it will take approximately 2 minutes (0.0334 minutes) to read the responses/notices which provides a total annual burden estimate of 7,088.14 burden hours for this activity.

Recordkeeping:

There is no record keeping for State agencies or Individuals/Households.

Third-Party Disclosure

There is no third-party disclosure for State agencies or Individuals/Households