

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0064:

Supplemental Nutrition Assistance Program (SNAP) Forms:

Applications, Periodic Reporting, and Notices

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7 CFR 271, 272, 273

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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 collection. This information collection addresses the application and certification procedures of the Supplemental Nutrition Assistance Program (SNAP) required by the Food and Nutrition Act of 2008 (the Act), as amended. (The Act is included in “Appendix A: The Food and Nutrition Act of 2008.”) The Federal regulations for implementing these procedures are contained in Title 7 of the Code of Federal Regulations (CFR) in Parts 271, 272, and 273. Part 271 contains general information and definitions, Part 272 contains requirements for participating State agencies, and Part 273 contains procedures for the certification of eligible households. (The regulations are included in “Appendix B: Parts 271, 272, and 273 of Title 7 of the Code of Federal Regulations.”)

This information collection is necessary to verify household eligibility for SNAP benefits, confirm household eligibility throughout participation in the program, and ensure that households receive the correct benefit amount. State agencies are responsible for determining the eligibility of applicant households and issuing benefits to those households entitled to benefits under the Act. Any information collected is limited only to what is necessary for the administration and enforcement of SNAP.

During the agency review process, FNS discovered there are reporting burden hours associated with State agency disclosures of SNAP applicant information to certain third-parties, under 7 CFR 273.4. To bring this required activity into compliance, we plan to publish a separate 60-day notice for public comment and will submit a separate revised information collection request

package including System of Record Notice (SORN) and relevant privacy statements for this OMB control number.

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 is a revision of the currently approved information collection burden under Office of Management and Budget (OMB) Control Number 0584-0064, “Supplemental Nutrition Assistance Program (SNAP) Forms: Applications, Periodic Reporting, and Notices.” In order to determine initial and continued eligibility for SNAP, applicants must provide, and State agencies must verify, various information on various household members, such as age, income, resources, allowable deductions, and Social Security Numbers (SSNs). This information must be collected to ensure households are eligible for SNAP, receive the correct benefit, and maintain eligibility for the program. Any information collected is limited only to what is necessary for the administration and enforcement of SNAP per Federal regulations in 7 CFR Parts 271, 272, and 273. This information collection is mandatory for State agencies that administer SNAP, as they are responsible for accepting applications from, and determining eligibility for, individuals and households (hereinafter referred to simply as “households”) that apply for SNAP. While a response is voluntary for households that apply for SNAP, it is required in order for them to obtain or maintain SNAP benefits from their State agency. Information that State agencies collect is generally not shared with any organization outside of the U.S. Department of Agriculture (USDA), except for certain disclosures of applicant information to certain third parties, which will be addressed in a separate 60-day notice for public comment and a separate

revised information collection request package including System of Record Notice (SORN) and relevant privacy statements for this OMB control number.

The information collected by State agencies and electively provided by households upon initial application and then recertification (an application to continue participation in the program after an initial period of eligibility) includes personal identifiable information (PII) such as name, date of birth, social security number, as well as information about various household circumstances, such as household size and income. Applications are available in electronic and paper format. Once electively provided by households, State agencies must verify application information provided in order to determine their SNAP eligibility and benefit amounts, and then conduct an interview with the applicant household. Interviews are conducted in person or over the telephone based on the option selected by the relevant State agency. The information requirements for recertification are similar, but slightly reduced compared to those for initial application. Households with regular earned income are generally required to recertify every 12 months, although the recertification period can be as little as one month, or as long as two years, based on their circumstances.

As part of the initial application and recertification process, State agencies are required to issue certain notices to households. This include notices when an application is denied, if an application is missing information, if a household misses their interview, if household benefits will soon expire, if household benefits will change, and when household benefits officially change. Notices provided by State agencies can be issued electronically or by paper.

Following initial certification or recertification, households are required to notify the Food and Nutrition Service (FNS) of any changes to their household status on a quarterly basis, monthly

basis, or whenever a change occurs based on the reporting options chosen by their State agency, in order to maintain SNAP benefits and eligibility. Some State agencies also use “simplified or periodic reporting,” alongside traditional reporting methodologies, where households only must report certain changes to their status such as household gross income exceeding 130 percent of the Federal poverty level or changes to the status of able-bodied adults without dependents (ABAWD) participants. All reporting requirements can be completed electronically or by paper.

Under recordkeeping requirements, State agencies must maintain records to ascertain whether the program is administered in compliance with Federal statutes and regulations. State agencies must maintain case records of households participating in SNAP for a period of three years from the date of origin. In addition, State agencies must also maintain the ability to search household case records in order to prevent individuals from receiving benefits in more than one household, and to prevent households from receiving benefits in more than one jurisdiction (commonly referred to as “duplicate participation”). Records can be maintained using automated retrieval systems rather than paper records.

As part of the burden adjustments associated with this revision, FNS included a set of existing requirements applicable to State agencies and households that were not delineated in previous information collections to more accurately reflect the requirements and burden associated with 7 CFR Parts 271, 272, and 273. In addition to all the other burden activities, these 22 now delineated requirements and the associated burden estimates are displayed in Appendix E (Burden Table) in the Reporting and Recordkeeping tab, denoted with highlights and “no” in Column A (“Requirement in Currently Approved Information Collection Request”). These requirements are also discussed in narrative form in Appendix F (Burden Narrative), denoted

with bold font and an asterisk before the burden activity title.

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.

In compliance with E-Government Act of 2002 (E-Gov), State agencies have the authority to use the technology that best suits the needs of their individual or unique systems of operation to comply with the reporting and recordkeeping requirements contained in this information collection. FNS has made every effort to provide for electronic submission as an alternative to paper submission in compliance with the E-Gov. FNS provides funding to support the development of electronic systems through Federal matching of States' administrative costs.

All households have the option to submit information required to obtain or maintain eligibility and benefits for SNAP electronically to automated eligibility systems maintained by State agencies. State agencies submit 100 percent of program information to FNS electronically, and send aggregate level data on participation, benefits issued, and other basic program information to FNS using the Food Programs Reporting System (FPRS) via this website:

<https://fprs.fns.usda.gov>. (FPRS Form images are included in "Appendix D: Food Programs Reporting System (FPRS) Form FNS 388 Images" approved under OMB Control Number: 0584-0594; Expiration Date: 07/31/2023) Although households may elect to provide information on households members (such as age, income, resources, and allowable deductions) in order to obtain or maintain SNAP eligibility and benefits, FNS does not receive household-specific data, such as applications or individual case records, from State agencies that administer the program.

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 receives aggregate level data on participation, benefits issued, and other basic program information from State agencies that administer SNAP in order to ensure integrity and compliance with the Food and Nutrition Act (the Act), SNAP regulations, and other relevant federal laws. The information required for this collection is not currently reported to any other entity outside of FNS on a regular basis in a standardized form.

States are required to limit any collection of information to only what is necessary to comply with statutory SNAP requirements and to protect program integrity without imposing undue burden on respondents. SNAP regulations permit State agencies to use multi-program forms and notices as a method for application. For example, most States use a joint application for the Temporary Assistance to Needy Families Program (TANF) and SNAP, which allow a household to apply for both programs with a single application form. Some States also include applications for the Medicaid Program and other general assistance programs with the TANF/SNAP application. While joint applications may reduce the reporting burden for some information, the forms may become too long and complicated if too many applications are combined, which may deter some households from applying. Because of the numerous Federal or State means-tested

programs with variations in eligibility rules and benefit criteria, although there is no similar data collection we can use in lieu of this data collection, there may be duplication of some information collection and reporting may result for both States and households.

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. Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

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 mandatory information collection for State agencies that administer SNAP, and while information provided by households is voluntary, it is required in order for them to obtain and maintain SNAP eligibility and benefits. The information collected is for the purpose of certifying households for SNAP. If this information is not collected or collected less frequently, this would leave FNS and State agencies unable to implement the eligibility and certification standards set forth in the Act and SNAP regulations, and could result in State agencies over-issuing or under-issuing benefits to eligible households, or issuing benefits to ineligible households.

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;**

SNAP regulations (7 CFR 273.21) provide for a monthly reporting option to determine SNAP eligibility and benefits of the affected households. This requires households and State agencies to conduct reporting more frequently than a quarterly basis. This monthly collection is necessary to ensure the integrity of the program and to meet regulatory requirements.

- **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 other 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.

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.

A 60-day notice was published in the Federal Register (FR) on June 5, 2020 (85 FR 34592). The public comment period ended on August 4, 2020. FNS received one comment in response to the FR notice. The comment did not contain information relevant to the burden collection. The comment received is included in “Appendix C: Public Comments.”

From February to July 2020, FNS conducted limited consultations with State agency contacts familiar with SNAP Forms activities to better inform burden estimates contained in this ICR. The consultation questionnaire asked State agency contacts for their feedback on burden estimates for information collection activities associated with application, periodic reporting, and notices under SNAP. FNS distributed consultation questionnaires to five State agencies. The five individuals/organizations consulted about the information collection are listed in the table below.

Contact	Organization	Email
Betsy Suver	Ohio Department of Job and Family Services	Betsy.Suver@jfs.gov
Kimberlin Donald	Georgia Division of Family and Children Services	Kimberlin.donald@dhs.ga.gov
Linda Cavitt	Oklahoma Department of Human Services	Linda.Cavitt@okdhs.org
Daniel Giacomi	Connecticut Department of Social Services	Daniel.Giacomi@ct.gov
Amman Seehra	New Jersey Department of Human Services	Amman.Seehra@dhs.state.nj.us

FNS received responses from two State agency contacts, Georgia and Ohio. Based on the feedback provided by these two State agency contacts, FNS revised some of the burden estimates associated with reporting and recordkeeping activities. For both State agencies and Households, FNS increased the estimated average hours per response for the following reporting activities: initial interview (from 0.50 hours [30 minutes] to 0.6346 hours [38 minutes]), and recertification interview (from 0.33 hours [20 minutes] to 0.50 hours [30 minutes]). For local agencies, FNS increased the estimated average hours per response for the following recordkeeping activity: monitoring duplicate participation (from 0.0042 hours [less than 1 minute] to 0.0167 hours [1 minute]).

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 will be provided 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 will comply with the Privacy Act of 1974.

Section 11(e)(8) of the Act and 7 CFR 272.1(c) limit the use or disclosure of information obtained from applicant households or contained in case files of participating households to persons directly connected with the administration of SNAP, such as other Federal or Federally-assisted means-tested programs; persons directly connected with the verification of immigration status of aliens; the Office of the Comptroller General of the U.S. for audit and examination

authorized by any other provisions of law; local, State, or Federal law enforcement officials for the purpose of investigating an alleged violation of the Act or regulations; agencies of the Federal Government for purposes of collecting the amount of an over issuance from Federal pay; and any Federal, State or local law enforcement officer if a household member is a fleeing felon or a parole violator. The application for benefits contains personal identifying information on individuals doing business with FNS. Therefore, FNS published a Privacy Act Notice System of Records Notice (SORN) on March 31, 2000, entitled USDA/FNS-10: Persons Doing Business with the Food and Nutrition Service, in the Federal Register (65 FR 17251) to specify the uses to be made of the information collected.

While working on the renewal of the collection, we identified Privacy Act requirements related to State agencies collecting and storing personal identifiable information (PII) which needs to be added in the collection. Because the States submit this information to FNS in aggregated format, FNS will not have access to the PII; except as otherwise required by law. Unfortunately, due to competing priorities, our capacity levels, and the level of data needed to address these suggestions, FNS is unable to fully research and include these items in this renewal request which must be submitted to OMB before it expires on October 31, 2020. FNS plans to resolve this by requiring and ensuring States add any necessary Privacy Act Statements, Notices, or Advisories on their State-designed forms, on electronic portals, and in interviews. We have outlined in this collection how the data are safeguarded and stored to protect the PII collected and, will revise and publish system of record notices (SORN) in the Federal Register. FNS will resolve this by addressing these items in a revision of this collection, which will be submitted before the next renewal, and no later than the next three-year renewal. FNS will resolve this

through a continuous review and improvement cycle with the FNS Privacy Officer that will result in collection revisions in anticipation of future renewals.

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 include other private or sensitive questions. Section 16 (e) of the Act requires each household member to furnish his or her Social Security Number (SSN) to State agencies and for State agencies to use SSNs in administration of SNAP, but only to the extent necessary for the purposes of determining or verifying a household's eligibility and benefit level. Under SNAP regulations at 273.2(b)(4), while providing an SSN is voluntary, refusal of a household member to provide an SSN will result in the denial of eligibility for SNAP and benefits.

In addition, to comply with Civil Rights requirements, any State agency SNAP application form must contain a nondiscrimination statement and solicit racial/ethnic information from applicants. The applicant must be notified that reporting such information is voluntary and will not affect the household's eligibility or benefit determination.

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 detailed, estimated reporting and recordkeeping burdens for this collection, including the number of respondents, frequency of response, average time to respond, and estimated man-hours, are detailed in “Appendix E: Burden Table” and “Appendix F: Burden Narrative.”

Reporting Burden: (53 State agency and 19,699,000 Individual/Household)

The reporting burden for this information collection includes 19,699,053 respondents, 772,614,489 total annual responses, and 119,352,984 estimated total hours. Due to adjustments, this is an increase of 45,672,815 total hours as a result of the inclusion of existing information collection requirements in this revision, an increase in the number of respondents for some requirements, and an increase in the estimated burden hours per response for some requirements in order to account for their full complexity.

Affected Public	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total Burden
State agencies	53	7,389,511.23	391,644,095	0.13	51,929,547.12
Households	19,699,000	19.3395803811	380,970,394	0.18	67,423,437.06
Total Burden Estimate	19,699,053	39.22	772,614,489	0.15	119,352,984.18

Recordkeeping Burden: (53 State; 2,724 Local or Tribal Government Agencies)

The recordkeeping burden for this information collection includes 2,724 respondents, 165,178,796 total annual responses, and 4,834,313 estimated total hours. This is an increase of

824,477 burden hours as a result of increased SNAP caseload.

Affected Public	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total Burden
Local agencies	2,724	60,638.32	165,178,796	0.03	4,834,312.59
Total Burden Estimate	2,724	60,638.32	165,178,796	0.03	4,834,312.59

Total Burden

The total burden for this information collection includes 19,701,777 respondents, 937,793,285 total annual responses, and an estimated total burden of 124,187,297. For a description of all adjustments to the reporting and recordkeeping burdens and complete details on the burden calculations, see “Appendix E: Burden Table” and “Appendix F: Burden Narrative.”

Summary	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total Burden
Reporting	19,699,053	39.22	772,614,489	0.15	119,352,984.18
Recordkeeping	2,724	60,638.32	165,178,796	0.03	4,834,312.59
TOTAL	19,701,777	47.60	937,793,284.93	0.13	124,187,296.77

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

The annual estimated cost to respondents is \$1,350,477,046.72. To estimate public cost for State and local agencies, FNS used mean (average) hourly wage data published by the U.S. Department of Labor, Bureau of Labor Statistics (BLS) for State and local government agencies. Specifically, FNS used the median hourly wage for eligibility interviewers of government programs.^{1,2} FNS then adjusted each of these hourly wage rates to reflect total compensation, which includes non-wage factors such as overhead and fringe benefits (e.g., health and retirement benefits). To do this, we used an overhead and fringe benefits rate of 33 percent.

To calculate the public costs for households, FNS uses the current Federal minimum wage rate of \$7.25 per hour, as reported by the U.S. Department of Labor.³

Using the hourly wage rates adjusted to include fringe benefits (“fully-loaded”) and the total estimated hourly burden, the cost to State agencies is estimated at \$1,433,255,501, local agencies \$145,029,378, and households \$488,819,919. However, FNS reimburses 50 percent of the administrative costs State agencies incur in meeting the requirements of the information collection. Therefore, the actual costs for State agencies would be \$716,627,751 (i.e., $\$1,433,255,501 \times 0.50 = \$716,627,751$).

¹ BLS Occupational Employment and Wages Statistics data from May 2019; Occupation Code 43-4061 Eligibility Interviewers, Government Programs; Median Hourly Wage Rate for State Government = \$20.75. Available at https://www.bls.gov/oes/current/naics4_999200.htm#43-0000.

² For local government agencies, FNS used BLS Occupational Employment and Wages Statistics data from May 2019; Occupation Code 43-4061 Eligibility Interviewers, Government Programs; Median Hourly Wage Rate for Local Government = \$22.56. Available at https://www.bls.gov/oes/current/naics4_999300.htm#43-0000.

³ Available at <http://www.dol.gov/whd/minimumwage.htm>.

Respondent	Hourly Wage Rate (adjusted for fringe benefits)	Total Burden Hours	Cost (rounded to nearest whole dollar)
<i>A</i>	<i>B</i>	<i>C</i>	<i>D = B x C</i>
State agencies	\$27.60	51,929,547.12	\$716,627,750 ⁴
Local agencies	\$30.00	4,834,312.59	\$145,029,378
Households	\$7.25	67,423,437.06	\$488,819,919
Total		124,187,296.77	\$1,350,477,047

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.

The total annual cost to the Federal Government is \$716,709,716. This cost includes reimbursement of 50 percent of the administrative costs incurred by State agencies, which we estimated at \$716,627,751 (refer to Section A12.B of this document); the costs associated with a contractor that supports FNS regulatory efforts in the amount of \$61,915; and \$20,050 FNS staff salary for this collection. See description and the fully-loaded federal wages associated with hours to draft and review this information collection in the table below.

⁴ Adjusted to exclude 50% Federal reimbursement

Labor Category	Activities	Hours	Hourly Wage Rate*	Dollars**
Program Analyst (GS-12/2)	The hourly burden estimate associated with the development of the OMB package includes the time spent on contract activities, reviewing drafts of the burden estimates, making edits to these drafts, consulting the CFR to confirm estimates, providing feedback over email, drafting supporting statement and burden table elements, coordinating consultation contacts, communicating with the agency regulatory office, and sharing information with agency administrators.	320	\$56.86	\$18,195
Branch Chief (GS-14/1)	The hourly burden estimate associated with the development of the OMB package includes reviewing the draft burden estimates, discussing burden estimate elements, briefing agency administrators, and communicating with the agency regulatory office to move forward the process when needed.	24	\$77.31	\$1,855
Contractor Support	FNS has contractor support in the development of the OMB package materials. The cost burden associated with this support is in the amount of \$61,915. This estimate covers contractor support in assisting FNS in drafting the 60-day Federal Register Notice, coordinating consultations, drafting the supporting statement, and developing other OMB package materials. Fixed cost associated with contractors already includes fully-loaded wages.	Not Applicable	Not Applicable	\$61,915
Cost of Federal Workers and Contractors				\$81,965
50% Federal Share of State Cost				\$716,627,751
Total				\$716,709,716

*Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf)

**Rounded to the nearest whole dollar.

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 a revision of a currently approved information collection. The currently approved burden estimates for this data collection is 77,690,005 total annual burden hours and 643,938,886 total annual responses. In this revision, FNS is requesting 124,187,297 total annual burden hours and

937,793,285 total annual responses. These adjustments resulted in an increase of 46,497,292 total annual burden hours and 293,854,399 total annual responses for this information collection. This includes the addition of a set of existing requirements applicable to State agencies and households that were not delineated in previous burden estimates for this information collection. In addition, FNS updated the estimated burden hours per response for several activities in order to account for the full complexity of all requirements. For more details on the burden calculations, see “Appendix E: Burden Table” and “Appendix F: Burden Narrative.”

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.

This collection does not employ statistical methods and there are no plans to publish the results of this collection for 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.

We are not seeking approval concerning the display of the expiration date.

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.