

Appendix 2–
Burden Narrative for
Employment and Training Opportunities in the Supplemental Nutrition Assistance Program Final
Rule

State Agency Reporting Activities:

1. Case management - While many State agencies currently provide case management to SNAP E&T participants, this final rule requires 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 is 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 ($(0.5 \text{ hours} + 0.25 \text{ hours} + 0.0676 \text{ hours}) / 3.27 \text{ months} = 0.326$). The Department also estimates that each case manager will require 0.167 hours to prepare for each case management session, or an average of 0.167 hours per meeting ($(0.167 \text{ hours} + 0.167 \text{ hours} + 0.167 \text{ hours} + 0.045 \text{ hours}) / 3.27 \text{ months} = 0.167 \text{ hours}$). The total amount of time preparing for meetings and conducting meetings is 0.493 hours per session ($0.326 + .167 = 0.493$)

The overall burden estimate for providing case management services is 741,567 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, for a total of 120,335 burden hours (1,504,193 responses x 0.08 hours = 120,335 hours).

2. Notify E&T participants of the provider determination - The final rule would require the State agency to notify every household with an individual who has a provider determination for an E&T component by an E&T provider of this determination. 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 provider determination by an E&T provider. The Department estimates it will take a State agency approximately 5 minutes (0.083 hours) to notify the individual.

The total annual burden hours for each State agency to notify the individual is 3,818 hours (46,000 individuals x 0.083 hours = 3,818 hours), or approximately 72 hours per State agency respondent (3,818 hours ÷ 53 State agencies = 72 hours per State agency).

3. New elements on the FNS 583 - State agencies must already prepare data for the FNS-583 form on a quarterly basis. FNS is adding four 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; 2) of those in number (1), the number who begin participation in the E&T program; 3) of those in number (1), the number who begin participation in an E&T component; and 4) The number of individuals who

are required to participate who are sanctioned for non-compliance. This information would be collected on an annual basis, in the 4th quarter report.

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 an additional 4 hours to compile and record the number of SNAP participants who are required to participate in E&T, the number of mandatory E&T participants who begin participation in an E&T program, the number who begin participation, and the number who are sanctioned for non-compliance (1 hour per data element).

The total annual burden for reporting the number of individuals required to participate in E&T, the number of mandatory E&T participants who begin participation in an E&T program, the number who begin participation in a component, and the number who are sanctioned for non-compliance is approximately 68 hours ($17 \times 4 = 68$ hours).

4. Informing ABAWDs of the ABAWD work requirement and time limit. The Department will require every State agency to inform every ABAWD about the ABAWD work requirement and time limit. The Department estimates approximately 2,700,000 ABAWD participants in FY 2021. The Department estimates it will take each State agency 5 minutes (0.083 hours) to inform each ABAWD about the ABAWD work requirement and time limit.

The total annual burden for developing the written notice informing ABAWDs of the ABAWD work requirement and time limit is approximately 2,120 hours (53 State agencies x 40 hours = 2,120 hours), or approximately 40 hours per State agency (2,120 hours ÷ 53 State agencies = 40 hours).

The total annual burden for informing ABAWDs of the ABAWD work requirement and time limit is approximately 224,100 hours (2,700,000 ABAWDs x 0.083 hours = 224,100 hours), or approximately 4,228 hours per State agency respondent (224,100 hours ÷ 53 State agencies = 4,228 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 ($[0.326 \times 0.90] + [1.326 \times 0.10] = 0.426$).

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 a provider determination and will be informed by the State agency. The Department estimates that approximately 46,000 participants will receive that information.

The total annual burden to participants to be informed of the provider determination is 3,818 hours (46,000 participants \times 0.083 hours = 3,818 hours), or approximately 0.083 hours per participant (3,818 hours \div 46,000 participants = 0.083 hours).

The overall total estimate burden for informing individuals of the provider determination is 3,818 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 notice of their ABAWD work requirement and time limit. The Department estimates approximately 2,700,000 ABAWDs will receive and read this written notice.

The total annual burden to participants to read the written notice is 224,100 hours (2,700,000 participants x 0.083 hours = 224,100 hours), or approximately 0.083 hours per participant (224,100 hours ÷ 2,700,000 participants = 0.083 hours).

The overall total estimate burden for reading the written notice is 224,100 total burden hours and 2,700,000 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 5,496,000 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.