

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-[new]:

Final Rule: Employment and Training Opportunities in the Supplemental Nutrition Assistance Program

(RIN 0584- AE68)

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7 CFR Parts 273.7, 273.24.

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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.

FNS is requesting a new OMB control number. There are five parts to this information collection associated with the final rule, Employment and Training Opportunities in the Supplemental Nutrition Assistance Program (RIN 0584- AE68). One part requires a revision to an existing information collection (SNAP Employment and Training Program activity Report; OMB Control Number: 0584-0594; Expiration Date: 07/31/2023) in order to add three new data elements to the FNS-583. The other four parts of the information collection are new and do not have existing burden collections. FNS is seeking a new OMB control number for the information collection associated with this rulemaking. These changes are required by changes made by section 4005 of The Agriculture Improvement Act of 2018 (P.L. 115-334) (the Act) to the Supplemental Nutrition Assistance Program (SNAP) and are allowable under the authority granted to the Department to administer SNAP in section 4(c) of the Food and Nutrition Act of 2008.

First, the Act requires that individuals participating in SNAP Employment and Training (E&T) must be provided with case management services. Many State agencies already provide case management activities to SNAP E&T participants; however, State agencies are not currently reporting this activity to the Department and the Department is not currently collecting case management activities from these State agencies. This regulatory change will help ensure that E&T participants receive the guidance and support needed to move toward self-sufficiency. Second, the Act establishes that individuals participating in an E&T component who are determined ill-suited by the E&T provider for that component, must re-engage with the State

agency to identify another type of training or assistance. The Department proposes at 7 CFR 273.7(c)(18)(i) that individuals who have been determined ill-suited be notified by the State agency of this determination. Notifying individuals will constitute a new burden for State agencies. Third, to increase State accountability for moving SNAP participants toward self-sufficiency, the Department will add 7 CFR 273.7(c)(11) to add four additional data elements to the FNS-583 reports (SNAP Employment and Training Program Activity Report; OMB Control Number: 0584-0594; Expiration Date: 7/31/2023) to collect information on the number of SNAP applicants and participants who are required by the State agency to participate in an E&T program, of those the number who actually begin to participate in an E&T program and begin participation in an E&T component, and the number who are sanctioned for non-compliance. Fourth, the Department will add new paragraph at 7 CFR 273.24(a)(5) to add a State agency requirement to inform every Able-bodied Adults without dependents (ABAWD) about the ABAWD work requirement and time limit, thus creating a new State burden to develop a written notice explaining the ABAWD work requirement and time limit and to inform ABAWDs of their work requirement and time limit. Fifth, the Department will add a State agency requirement at 7 CFR 273.14(b)(5) 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 Department notes that the final rule would also create a new requirement for State agencies to consult with their workforce development boards, and to explain in their E&T State plans the extent to which they will coordinate with title 1 of WIOA. Based on the existing regulatory requirement to work with their State workforce development systems, this

information is already collected by the Department through the E&T State plans and is included in an existing burden (OMB Control Number: 0584-0083; Expiration Date: 7/31/2020, currently under OMB review), as a result the new Farm Bill requirement is not expected to increase the existing burden.

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 information will be used to better administer the SNAP Employment and Training Program, and provide improved customer service to SNAP E&T participants and ABAWDs. First, section 4005 of the Act requires State agencies to provide case management to E&T participants, so if the Department does not require State agencies to conduct case management services, the Department will be out of compliance with Federal regulations. Second, the Act requires State agencies to respond to a provider determination made by an E&T provider. If the Department does not require State agencies to notify individuals with an ill-suited determination, the E&T participant with a provider determination may not be informed that an E&T provider has made this determination. Third, the Department is adding four additional data elements related to mandatory E&T participants to the FNS-583. Existing regulations at 7 CFR 273.7(c)(9) through 7 CFR 273.7(c)(11) require State agencies to submit E&T Program Activity Reports no later than 45 days after the end of each Federal fiscal quarter. The current data elements collected as part of the FNS-583 enable the Department to gauge the number of work registrants in each State and the number of SNAP participants enrolled in E&T components. The four new data elements related to mandatory E&T participants will be required to be reported by the State agency to the

Department on the fourth quarter report. This information will enable the Department to provide improved oversight and technical assistance to State agencies to strengthen the administration of mandatory E&T programs. Fourth, the Department is adding a requirement for State agencies to develop a written notice for ABAWDs explaining their ABAWD work requirement and time limit and to inform them of their work requirement and time limit. This requirement will improve communication between the State agency and the ABAWD regarding the work requirements the ABAWD is subject to as a SNAP participant. Fifth, 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. This requirement will assist the targeted individuals in finding opportunities to move toward self-sufficiency. All burden requirements are detailed in the Burden Narrative in Appendix B.

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.

The collection of information will involve the use of automated and electronic techniques. The collection of additional FNS-583 data elements will involve submission of data through the Food Program Reporting System (FPRS) (SNAP Employment and Training Program Activity Report; OMB Control Number: 0584-0594; Expiration Date: 07/31/2023 currently under renewal).

States are required to obtain e-Authorization and submit the required information to

<https://www.fprs.fns.usda.gov/home>.

The generation of the written notice on the ABAWD work requirement will be sent through State-supported certification policy management information solutions (MIS) that support eligibility and client notification. The delivery of case management services by State agencies will be facilitated by State E&T MIS systems. Therefore, the Department estimates all 53 State agencies will submit the FNS-583 form electronically. Additionally, the remaining data collection from State agencies is captured in their MIS. Furthermore, the proposed rule does not require individuals/households (SNAP E&T Participants) to submit any items to the Department electronically or otherwise. To sum up, out of the entire data collection request, the Department estimates approximately 100 percent of the data collected is submitted electronically.

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 solely monitors the SNAP E&T programs to ensure integrity and the information required for this collection is not currently reported by the State Agencies on a regular basis in a standardized form.

The State requirements to offer case management service to E&T participants is a new requirement authorized in section 4005 of the Act. The Act introduced a new process whereby

E&T providers identify individuals who are ill-suited for their programs, necessitating the requirement that the State agency notifies these E&T participants of the provider determination. Although this rulemaking will add four new reporting elements related to mandatory E&T participants to the FNS 583, there is no duplication, as States are not required to report these elements on other forms. Once OMB approves these changes to the FNS-583, the Department will merge the updates into the SNAP Employment and Training Program activity Report, OMB Control Number: 0584-0594, Expiration Date: 07/31/2023 (currently under renewal) once the final rulemaking has been approved by OMB. There is no existing explicit requirement in the Food and Nutrition Act of 2008 or the regulations that ABAWDs receive a written notice of the ABAWD work requirement or time limit. Lastly, the requirement that the State agency advise certain zero earned income households of available employment and training opportunities is a new requirement authorized under section 4005 of the Act.

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. There are no small businesses associated with this information collection.

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 a mandatory, ongoing data collection. State agencies are required to comply with the requirements as part of their overall responsibility to properly administer the SNAP program.

This is a mandatory requirement for State agencies only and there is no penalties or adverse action taken on the individuals/households (I/H) in this data collection. The consequence to the Federal program if the collection is not conducted will be as follows:

- If the Federal government does not require States to conduct case management services, the Federal government will be in violation of Federal law.
- If the Federal government does not require State agencies to notify E&T participants with a provider determination, the individual may not know they were determined ill-suited for a particular program, and ABAWDs may not know that they continue to accrue countable months. This would be in contradiction with USDA's pledge to improve customer service in all of its programs.
- If the Federal government does not collect the additional data elements on the FNS 583, the Department will be unable to provide enhanced oversight of State agency E&T programs to ensure States are operating robust programs that reasonably serve individuals required to participate in them.
- If the Federal government does not develop a written notice and inform ABAWDs of the ABAWD work requirement and time limit, ABAWDs may not be adequately informed of the steps they must engage in to maintain SNAP eligibility. This would be in contradiction with USDA's pledge to improve customer service in all of its programs.

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. 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 Federal Register Notice was embedded in the proposed rule titled “**Employment and**

Training Opportunities in the Supplemental Nutrition Assistance Program (SNAP) (RIN 0584-AE68)” published on March 17, 2020(85 FR 15304).

The Department received some comments directly on the cost and hour burden, as well as comments related to the underlying policy. As a result, the Department has made changes to the estimated burden in the final rule. Regarding the requirement that all E&T participants receive case management, the Department received a comment from a State agency agreeing that the State agency will experience increased costs as a result of the requirement, but the State agency did not dispute the values provided in the burden. The Department did receive one comment that State agency staff will need to time to prepare for the case management sessions, thus the Department added 10 minutes per case management meeting to account for this preparation time. Regarding the requirement in the proposed rule to send a Notice of E&T Participation Change (NETPC) when an individual receives a provider determination, the Department received a comment from a State agency that the notice was unnecessary and more costly to implement than provided for in the burden. The Department, as described in the final rule preamble, has decided not to require the NETPC, and instead will only require that State agencies notify the participant with State discretion regarding the mode for providing the information. The burden has also been updated to account for the act of notifying the individual, rather than sending a formal notice. Regarding the new data elements for the FNS-583, the Department received several comments requesting the Department add a third and fourth data element capturing the number of individuals who begin an E&T component and the number of individuals who are sanctioned for failure to comply. The Department agreed with these commenters and has added a third and fourth data element to the FNS-583 fourth quarter report. The burden for the FNS-583 new data

elements has been updated to include this third and fourth element, and to correct errors in estimation during the proposed rule, resulting in a decrease in burden hours for this element. Regarding the requirement to inform ABAWDs of the ABAWD work requirement, the Department received one comment from a State agency that the impact of the proposal would add burden to the State agency, but on balance, the State agency believed that it may be time well spent if ABAWDs better understand the work requirement, thus reducing churn. The Department has modified the burden for informing ABAWDs of the work requirement by increasing the time to orally inform the ABAWD from two minutes to five minutes to account for the additional information commenters believed should be communicated during the interaction (e.g. good cause and exemption). The Department also increased the amount of time it will take State agencies to develop the written notice from 24 to 40 hours to account for the greater amount of information required to be in the notice in the final rule. Regarding the requirement that State agencies advise certain households with zero earned income, the Department received no comments regarding the burden and has made no changes to the burden from what was proposed.

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.

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 complies with the Privacy Act of 1974. No confidential information is associated with this information collection. Section 7(b) of the Privacy Act (P.L. 93-579, U.S.C. 552a) requires that Federal, State or local government agencies which request individuals to disclose their SSN be informed (1) whether that disclosure is mandatory or voluntary, (2) by what statutory authority or other authority each number is solicited, and (3) what uses will be made of the number. The Privacy Act requires that before personal identifying information (such as SSN or EIN) may be shared with other entities, a Privacy Notice must first be published. FNS published such a Privacy Act notice FNS 10- Persons Doing Business with Food Nutrition Service (System of Records) to specify the routine uses to be made of the information in this collection. This Notice was published in the Federal Register on March 31, 2000, Volume 65, Number 63, and is located on pages 17251-17251.

Section 9 of the Act, U.S.C. 2018, authorizes collection of the information on the application. Section 278.1(b) of the FSP regulations provides for the collection of the owners' SSN, EIN and tax information.

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 not involve the collection of any information of a sensitive nature.

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 total number of burden hours associated with this final rule is 2,071,908 and total number of responses is 15,500,709. Please see burden narrative (Appendix 2) for a full description of these estimates.

Reg. Section	Affected Public	Respondent Type	Description of Activity	Estimated Number of Respondents	Estimated Frequency of Response	Total Annual Responses	Number of Burden Hours Per Response	Estimated Total Burden Hours	Previous Burden Hours Used	Differences Due to Program Changes	Difference Due to Adjustment	Hourly Wage Rate*	Fully Loaded Hourly Wage Rate (x.33)	Estimated Cost to Respondents
7CFR 273.7(c)(1)	State Agencies	State Agency E&T Case Manager*	Provide Case Management Services	53	28,381	1,504,193	0.493	741,567.15	0	0	0	\$29.69	\$39.487 7	\$29,282,781
7CFR 273.7(c)(1)		State Agency E&T Case Manager*	Document Case Management Services	53	28,381	1,504,193	0.08	120,335.44	0	0	0	\$29.69	\$39.487 7	\$4,751,770
7 CFR 273.7(c)(18) (i)		State Eligibility worker*	Notify E&T Participants of Provider Determination	53	868	46,000	0.083	3,818.00	0	0	0	\$22.65	\$30.124 5	\$115,015
7 CFR 273.7(c)(11)		State Agency Administrative Staff*	Reporting FNS 583 data elements** (OMB Control Number 0584-0594)	53	4	212	98	20,776.00	21,889	0	1,113	\$18.41	\$24.485 3	\$508,707
7 CFR 273.7(c)(11)		State Agency Administrative Staff*	Reporting additional FNS 583 data elements	17	1	17	4	68.00	0	51	0	\$18.41	\$24.485 3	\$1,665
7 CFR 273.7(a)(5)		State Agency Administrative Staff*	Develop ABAWD written statement of work requirements	53	1	53	40	2,120.00	0	0	0	\$18.41	\$24.485 3	\$51,909

7 CFR 273.7(a)(5)		State Eligibility worker*	Inform ABAWDs of the ABAWD work requirement	53	50,943	2,700,000	0.083	224,100.00	0	0	0	\$22.65	\$30.124 5	\$6,750,900
7 CFR 273.14(b)(5)		State Agency Administrative Staff*	Develop list of Employment and Training Services	53	1	53	24	1,272.00	0	0	0	\$18.41	\$24.485 3	\$31,145
Sub-Total State Agencies				53	108,575.642	5,754,509	0.1899868	1,093,281						\$40,985,186
7CFR 273.7(c)(1)	Individual & Household	E&T Participants	Participate in Case Management	460,000	3.27	1,504,200	0.426	640,789.00	0	0	0	\$7.25	n/a	\$4,645,720
7 CFR 273.7(c)(18) (i)		E&T Participants	Review Information on Provider Determination	46,000	1	46,000	0.083	3,818.00	0	0	0	\$7.25	n/a	\$27,681
7 CFR 273.7(a)(5)		E&T Participants	Read ABAWD written statement of work requirements	2,700,000	1	2,700,000	0.083	224,100.00	0	0	0	\$7.25	n/a	\$1,624,725

7 CFR 273.14(b)(5)		E&T Participants	Read list of Employment and Training Services	5,496,000	1	5,496,000	0.02	109,920.00	0	0	0	\$7.25	n/a	\$796,920
Sub-Total Individual/Households				8,702,000	1.119995403	9,746,200	0.100411 1	978,627						\$7,095,046
Grand Total Reporting Burden with both affected public and States				8,702,053	108,576.7 6	15,500,709	0.133665 3	2,071,908	21,889	8,788	1,113			\$48,080,231

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

1. Case management - The overall estimates burden for the State to provide case management is 741,568 total burden hours and 1,504,193 annual responses. Assuming a fully-loaded (+33%) hourly wage rate of \$39.49 for an E&T case manager (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 21-1029), the total estimated cost to the State agency is \$29,282,781.

The overall estimate burden for documenting case management services is 120,335 total burden hours and 1,504,193 annual responses. Assuming a fully-loaded (+33%) hourly wage rate of \$39.49 for an E&T case manager (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 21-1029), the total estimated cost to the State agency is \$4,751,770.

The Department also estimates a cost for the Individuals/ who participate in case management. 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.

2. Notify E&T participants of the provider determination - The overall estimate burden to

notify E&T participants of the provider determination is 38,180 burden hours and 46,000 annual responses. Assuming a fully-loaded (+33%) hourly wage rate of \$30.12 for a State eligibility worker (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 43-4061), the total estimated cost to the State agency is \$115,015.

The Department also estimates a cost for the individuals to be notified of the provider determination. The overall total estimate burden for reviewing this information is 3,818 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 \$27,681.

3. New elements on the FNS-583 - The overall estimates burden is 68 total burden hours and 17 annual responses. Assuming a fully-loaded (+33%) hourly wage rate of \$18.41 for a State agency administrative staff member (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$1,665.
4. ABAWD written notice - The overall total estimated burden for developing the ABAWD written notice is 2120 hours total burden hours and 53 annual responses. Assuming a fully-loaded (+33%) hourly wage rate of \$18.41 for a State eligibility worker (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$51,909.

The overall estimate burden for informing ABAWDs of the ABAWD work requirement and time limit is 224,100 total burden hours and 2,700,000 annual responses. Assuming a fully-loaded (+33%) hourly wage rate of \$22.65 for a State eligibility worker (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 43-4061), the total estimated cost to the State agency is \$6,750,900.

The Department also estimates a burden to participants to read the written notice. The overall total estimate burden for reading the written notice is 224,100 total burden hours and 2,700,000 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 \$1,624,725.

5. Advisement of employment and training services – 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 a fully-loaded (+33%) hourly wage rate of \$18.41 for a State eligibility worker (Bureau of Labor Statistics May 2019 Occupational and Wage Statistics, 43-9199), the total estimated cost to the State agency is \$31,145.

The Department also estimates a burden to participants to read the list. 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.

The basic recordkeeping requirement for household case file documentation is part of OMB Control Number: 0584-0064; Expiration Date 09/30/2020. 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: 07/30/2023 and 0584-0064, once the final rulemaking information collection request is approved.

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.

By law, the Federal government reimburses State agencies 50 percent of their SNAP administrative costs. The Department estimates States will incur \$20,492,593 in fully-loaded State administrative costs as part of this information collection ($40,985,186 \times .50 = 20,492,593$). The cost to the Federal government for an analyst (GS 12, step 6) to draft this data collection and for a supervisor (GS 14, step 1) to review equals \$617.69 ($(12 \text{ hrs} \times \$46.78/\text{hr}) + (1 \text{ hr} \times$

\$56.34/hr)). Thus, the total cost to Federal government is \$20,493,210.70

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.

Although we are revising the FNS 583, FNS is requesting a new OMB control number for this is information collection, for 0584-AE68 (Employment and Training Opportunities in the Supplemental Nutrition Assistance Program (SNAP)). FNS is requesting 2,071,908 burden hours and 15,500,709 total annual responses for this information collection to OMB burden inventory. In addition to new requirements, we are only adding the time it will take for the new additional reporting requirements for the FNS 583 and not the already approved time it currently takes to complete the FNS 583. The requirements associated with the FNS 583 will be merged back into the primary OMB Control Number: 0584-0594; Expiration Date: 07/31/2023; after the merge has been approved OMB can discontinue the newly assigned OMB control number. This information is delineated in the Appendix 3 AE68 Burden Estimates.

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.

The results of this information collection will not be published.

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 the revised FNS-583 form. For the State supplied written notice regarding ABAWD work requirements, and the list of employment and training services provided to certain types of households, the Department seeks approval to not display the OMB control number. While providing written notice and list would be required by each State SNAP agency once the proposed rule is finalized, each State agency develops its own notices and lists to implement Federal requirements. State agencies would not need to display an OMB control number on these documents. There are no forms or materials required to be produced by State agencies to conform with the case management requirement.

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 for this information collection.