

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0608:

**Supplemental Nutrition Assistance Program Requirement for National Directory of New
Hires Employment Verification**

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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 reinstatement with change of a previously approved information collection, currently in use without OMB approval. This information collection package originally consisted of two major components: (1) the National Directory of New Hires and (2) the Program Activity Statement FNS-366B. The information collection associated with the Program Activity Statement (FNS-366B) is currently approved as part of the burden for the FNS Food Programs Reporting System (FPRS), OMB Control Number #0584-0594, expiration 7/31/2023. Therefore, the information associated with the Program Activity Statement FNS 366B reporting burden requirements has been deleted from this collection, and 1,855 burden hours and 53 total annual responses for this activity have been removed from this information collection.

National Directory of New Hires

In the Interim Final Rule RIN 0584-AE36, which published on January 26, 2016 (81 FR 4159), FNS amended the SNAP regulations at 7 CFR 272.16 (Appendix C) to require State agencies to access employment data through the National Directory of New Hires (NDNH) at the time of certification, including recertification, to determine eligibility status and appropriate benefit amount for SNAP applicants. This requirement codified Section 4013 of the Agricultural Act of 2014 (P.L. 113-79) (Appendix A). The legislation was effective on February 7, 2014, and FNS implemented the mandated requirements by directive to all SNAP State agencies on March 21, 2014. The NDNH is a repository of employment, unemployment insurance, and quarterly wage data maintained by the U.S. Department of Health and Human Services (HHS) Office of Child

Support Enforcement (OCSE). The data in the NDNH include W-4 (new hire) records from the State Directory of New Hires, quarterly wage and unemployment insurance data from the State workforce agencies, and new hire and quarterly wage data from Federal agencies.

This rule provided the requirement that each State agency must establish a system to compare identifiable information about each adult household member against data from the NDNH. Section 4013 of the Agricultural Act of 2014 mandates that States use NDNH to verify applicant employment data and enter into a computer matching agreement with HHS pursuant to the authority in 42 U.S.C. 653(j)(10). State agencies are responsible for entering into a computer matching agreement with HHS in order to access the NDNH. The required system is used to verify that the employment status of adult household members is accurately reported on the SNAP application. Because the NDNH does not include employment data on individuals under the age of 18, this verification requirement is limited to adult household members. State agencies have the option to match against the NDNH quarterly wage and unemployment insurance data at their own discretion. Because the timeliness of quarterly wage and quarterly unemployment insurance data may not provide a true benefit to the State agency in determining eligibility and benefit levels, this rule only requires that States match against NDNH new hire data at minimum. If the State agency receives verification of information obtained through the NDNH match indicating the household is ineligible or was approved for the incorrect benefit amount, the State should deny, reduce or terminate benefits as applicable and establish a claim to collect any benefits that were overpaid in accordance with regulations at 7 CFR 273.18. FNS intends to merge the information collection associated with the NDNH into the Supplemental Nutrition Assistance Program (SNAP) Forms: Applications, Periodic Reporting, Notices, OMB

Control Number #0584-0064, expiration date 03/31/2021.

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.

The NDNH is a repository of employment, unemployment insurance, and quarterly wage data maintained by the U.S. Department of Health and Human Services (HHS) Office of Child Support Enforcement (OCSE). The data residing in the NDNH includes W-4 (new hire) records from the State Directory of New Hires, quarterly wage and unemployment insurance data from the State workforce agencies, and new hire and quarterly wage data from Federal agencies. State agencies are required by 7 CFR §272.16 (Attachment C) to use NDNH and compare identifiable information about each household member against data from the NDNH at the time of certification and recertification. This comparison is used to determine the eligibility status of the household and determine the correct benefit amount the household should receive. The State agency must independently verify the information prior to taking any adverse action against an individual. Should the State agency receive employment information via the NDNH that was previously unreported by the household, the State agency may issue a Notice of Match Results to the household to verify the information or contact the employer directly. The Notice of Adverse Action or Notice of Denial is issued by State agencies to participating households whose benefits will be reduced or terminated as the result of a change in household circumstances. The individuals/households will read the Notice of Adverse Action or Notice of Denial issued by the State agencies.

This match aims to improve Program integrity by reducing the risk of improper payments due to unreported or misreported income. States make the comparison of matched data at the time of application and recertification for Individuals/Households (SNAP participants).

The National Directory of New Hires is a mandatory information collection and it is required to obtain or retain benefits.

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.

FNS makes every effort to comply with E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections.

State agencies access the NDNH data via an interface between the State agency eligibility system and the NDNH system; thus, all transmission of data for NDNH are submitted electronically.

State agencies generally use an automated system of generating notices to those households requiring contact. Currently 53 States or 100% are conducting the match, and they are doing so 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.

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 monitors State performance to ensure program integrity and that the Program is being efficiently and economically operated.

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.

This is a mandatory, ongoing information collection request. Information being requested or required has been held to the minimum required for the intended use. Although two smaller State, Local, or Tribal Government Agencies are involved in this data collection effort, they deliver the same Program benefits and perform the same function as any other State Agency.

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.

The Agricultural Act of 2014 mandates the verification of employment via NDNH at certification, including recertification; thus, conducting the match less frequently would be non-compliant with Federal statute. If this data was not collected or collected less frequently, the State agencies would not be able to issue a Notice of Match Results to the household to verify the information nor would the States be able to contact the employer directly or in a timely manner. Households would not receive the Notice of Adverse Action or Notice of Denial issued by State agencies which notifies participants their benefits will be reduced or terminated as the result of a change in household circumstances.

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.

FNS published a 60-day notice for comments in the Federal Register on March 29, 2019 in

Volume 84 on Page 11928. At the time FNS published the notice, the type of collection we were requesting was a revision of a currently approved information collection request (ICR). The public comment period ended on May 29, 2019 and the current request expired May 31, 2019 before the program was able to submit the ICR. Now, we are requesting a reinstatement of a previously approved information collection in use without OMB approval. An updated 60-day notice was published for comments in the Federal register on January 4, 2021 in Volume 86 on Page 52. The public comment period ends on March 5, 2021. FNS received no comments submitted by the completion of the 60-day comment period.

FNS consults with Regional Offices regarding any proposed changes. Regional offices are in constant contact with State agencies which provides feedback on FNS processes and procedures that may impact them. For this Information Collection request, FNS contacted one State agency official that works closely with NDNH Employment Verification in each of the following States: The South Dakota Department of Social Services (Brandon Seibel, Brandin.Seibel@state.sd.us), Missouri Department of Social Services (Dana Carrington, Chief of Investigations, Dana.Carrington@dss.mo.gov), Colorado Department of Human Services (Teri Chasten, teri.chasten@state.co.us), Nebraska Department of Health and Human Services (Melissa Weyer, melissa.weyer@nebraska.gov). These State agency contacts were sent the Federal Register Notice and asked to share any feedback on the information collected related to NDNH Employment Verification to include their views on the burden activities. They have not submitted any feedback on the information collection as of March 5, 2021.

National Directory of New Hires – FNS has had multiple opportunities to consult with our State agencies and national association partners on this requirement.

- In January 2017, FNS sent letters and implementation plans to help the eight (of the 53) remaining States that had not implemented the NDNH match. FNS communicates monthly with HHS Office of Child Support Enforcement (OCSE) regarding State compliance with the NDNH match. As of December 25, 2020, all 53 State agencies have implemented the NDNH match. There have been no changes to procedures or the information being collected. FNS continues to provide State agencies with support with the NDNH match.
- On June 4, 2019 FNS reached out to three State agencies, Alabama, North Carolina, and Virginia to verify that our estimates for burden hours associated with the NDNH match were still accurate. As a result of the responses from these States, the estimates were updated.

	Former Estimate	New Estimate
Minutes per case to review status of match	1	3
Minutes per case to initiate contact with the employer	2	4
Minutes to issue NoAA or NoD	2	3

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.

FNS has no plans to provide payments or gifts 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. For the NDNH, household respondents will provide verification of their employment but no personally identifiable information is

collected. State agencies are responsible for entering into a Computer Matching Agreement with the Department of Health and Human Services to access the NDNH.

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.

There are no sensitive questions included in this submission.

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 annual burden requested for this information collection is 1,180,536.20 (1,180,536) respondents, 10,455,713.40 (10,455,713) responses, and 521,719.02 (521,719) burden hours.

There are fifty-three (53) State Agency respondents and 1,180,483.20 (1,180,483) household respondents.

State Agencies' reporting burden is estimated at 482,290.88 hours and 9,275,230.20 total annual responses. The household reporting burden hours is 39,428.14 and 1,180,483.20 total annual responses as stated in the narrative and shown in the tables below. There is no recordkeeping

burden for this collection.

STATE AGENCIES REPORTING BURDEN:

272.16 - National Directory of New Hires:

The State agency annual burden for the National Directory of New Hires is 482,290.88 hours and is comprised of three parts: (1) Applicant and recipient screening, (2) Verification of a match (including Request for Contact), and (3) the Notice of Adverse Action or Notice of Denial. The following burden hours are based on the assumption that State agencies will conduct matches on roughly 53 percent of their participants per year. The NDNH match is not conducted on participants under age 18. The NDNH match is already conducted by State agencies when they administer TANF benefits, so those people receiving both SNAP and TANF would already have their match and verification covered under that existing burden. The rate of participants not receiving a Temporary Assistance for Needy Families (TANF) supplement is 95 percent (thus excluding 5 percent of participants from the match). In 2018 56% of SNAP participants were over 18 years of age and would thus be eligible for the match. In 2018 5% of SNAP participants also received TANF. The assumption of 53% being subject to the match comes from calculating the percentage of recipients that do not receive TANF and are over 18 (56% adults multiplied by percentage of adult recipients that are not receiving TANF 95%). Thus, 53% of participants would be subject to the NDNH match.

The rates of participation for children and TANF recipients were based on fiscal year 2017 data provided in the FNS report, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2018*. The report is generated using a sample of SNAP Quality Control

(QC) data that is representative at both the state and national level, this report summarizes the characteristics of households and individuals who participated in SNAP in fiscal year 2018.

Based on participation rate of 40.5 million participants, 53 percent would equal roughly 21,485,455 cases per year.

- *Applicant and Recipient Screening:* The State agency must compare identifiable information about each adult household member against information from the NDNH. States must make the comparison of matched data at the time of application and recertification. It is estimated that approximately 37 percent of records submitted to NDNH have matching records returned, and that it will take the State agency approximately 3 minutes per case to review the status of the match and determine if additional verification is needed. Thus, assuming 7,799,626 matched cases are returned, the total number of burden hours for screening the status of returned matches is 390,761.26 hours.
- *Verification of Match:* The State agency must independently verify the information prior to taking any adverse action against an individual. Should the State agency receive employment information via the NDNH that was previously unreported by the household, the State agency may issue a Notice of Match Results to the household to verify the information or contact the employer directly, depending upon applicable simplified reporting requirements as defined at 7 CFR 273.12(a). It is estimated that approximately 5 percent of eligible cases submitted to NDNH result in an unduplicated employment match requiring independent verification, or 1,054,003 cases annually. It will take the State agency approximately 4 minutes to initiate contact with the employer or, in States that act on all changes, issue an RFC to the household. Thus, the State agency burden for reporting is 70,407.40 hours.

- Notice of Adverse Action or Denial:* The Notice of Adverse Action or Notice of Denial is issued by State agencies to participating households whose benefits will be reduced or terminated as the result of a change in household circumstances. It is estimated that approximately 40 percent of cases with an unduplicated employment match result in either a closed case, reduced benefits, or denial of eligibility. Based on estimates referenced in previous sections, this equals roughly 421,601.20 cases. It will take the State agency approximately 3 minutes to issue a Notice of Adverse Action (NoAA) or Notice of Denial (NoD). Thus, the State agency reporting burden for issuing a NoAA or NoD is 21,122.22 hours.

Table A12.1 Reporting Burden for State Agencies

Regulation	Burden Activity	Estimated Number of Respondents	Estimated Responses per Respondent	Estimated Total Annual Responses	Estimated Hours per Response	Estimated Total Annual Hours	Re
State Agency Reporting Burden							
272.2	Program Activity Statement	0	0	0	0	0	\$
272.16	NDNH - Applicant/Recipient Screening	53	147,162.75	7,799,626.00	0.0501	390,761.26	\$ 11
272.16	NDNH - Verification of Match	53	19,886.85	1,054,003.00	0.0668	70,407.40	\$ 11
272.16	NDND - Notice of Adverse Action or Notice of Denial	53	7,954.74	421,601.20	0.0501	21,122.22	\$ 11
State Agency Total		53	175,004.34	9,275,230.20	0.051997726	482,290.88	\$ 11
Household Reporting Burden							
272.16	NDNH - Response to Request for Contact	758,882.00	1.00	758,882.00	0.0334	25,346.66	\$ 7.1
272.16	NDNH - Response to Notice of Adverse Action or Notice of	421,601.20	1.00	421,601.20	0.0334	14,081.48	\$ 7.1

	Denial						
Household Reporting Total	1,180,483.20	1	1,180,483.20	0.0334	39,428.14	\$	7.
Grand Totals	1,180,536.20	8.85674950 1	10,455,713.40	0.049897984	521,719.02		

INDIVIDUAL/HOUSEHOLD REPORTING BURDEN:

272.16 - National Directory of New Hires:

- Request for Contact:* The State agency must independently verify the information prior to taking any adverse action against an individual. Should the State agency receive employment information via the NDNH that was previously unreported by the household, the State agency may issue a Notice of Match Results to the household to verify the information or contact the employer directly, depending upon applicable simplified reporting requirements as defined at 7 CFR 273.12(a). Thirty eight (38) State agencies (or 72 percent of the total) act on all changes and require a Notice of Match Results to verify information with household. It is estimated that 758,882 households with unduplicated employment matches would receive a Notice of Match Results, and it will take each household approximately 2 minutes to read and respond to the RFC. Thus, the household burden for the RFC is 23,346.66 hours.
- Notice of Adverse Action or Denial:* The Notice of Adverse Action or Notice of Denial is issued by State agencies to participating households whose benefits will be reduced or terminated as the result of a change in household circumstances. It is estimated that approximately 40 percent of cases with an unduplicated employment match result in either a closed case, reduced benefits, or denial of eligibility. Out of 758,882 Individuals/Households SNAP participants who receives the Notice of Match Results,

421,601.20 of the same I/H will go on to receive the Notice of Adverse Action or Notice of Denial. It will take the household approximately 2 minutes to read the NoAA or NoD. Thus, the household reporting burden for reading a NoAA or NoD is 14,081.48 hours. There is no recordkeeping burden imposed on individuals/households SNAP participants.

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

Annual respondent cost with fully loaded wages is estimated at \$482,290.88. This includes the 50 percent of all administrative costs involved in each State agency's operation of the program as well as the addition of 33 percent of wage costs to account for fringe benefits. The estimate of respondent cost is based on the burden estimated developed in 12(a) above. Based on the Bureau of Labor Statistics May 2019 Occupational Employment and Wages Report (<https://www.bls.gov/oes/current/oes130000.htm>), hourly mean wage for Eligibility Interviewers functions performed by State and local agency staff are valued at \$22.65 per staff hour.

According to the Bureau of Labor Statistics, the Federal minimum wage rate is \$7.25 an hour. Based on the total estimated burden hours for household reporting of 39,428.14, the total cost to households is \$285,854.01.

Therefore, the total estimated annual respondent costs for this collection, including the state respondent costs of \$7,264,385.85 and the household costs of \$285,854.01 is \$7,550,239.86.

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 and/or annualized maintenance costs associated with this burden.

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 combined estimated total annualized cost to the Federal Government is **\$7,265,114.81** including 33 percent of the annual base cost to respondents to capture fully loaded wages. This cost includes \$7,264,385.85 reimbursable rate paid to State agencies + \$728.96 the total cost of Federal workers (\$496.44 for FNS Program Analyst and \$232.52 for FNS Branch Chief). The breakdown of the costs are identified below.

The Federal cost also includes the cost associated with the preparation of this information collection package. This includes Federal worker time at FNS for the following:

	Hours	Hourly Wage*	Total
GS-12 Program Analyst	12	\$41.37	\$496.44
GS-14 Branch Chief	4	\$58.13	\$232.52

Cost of Federal workers:

\$728.96

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

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The total cost to the Federal government takes the total State governmental costs for reporting: \$14,528,771.71 minus 50% reimbursable cost attributed to the Federal government share is \$7,264,385.85, plus the cost of Federal workers staff hours to draft, review, approve, manage, maintain and implement this information collection of \$728.96 = a total **cost to the Federal government: \$7,265,114.81**

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 information collection is currently in violation. This is a reinstatement with change of a previously approved information collection, currently in use without OMB approval. This collection was previously approved with 12,277,204 total annual responses and 252,432 total burden hours. We are requesting 10,455,713.40 (10,455,713) total annual responses and 521,719.02 (521,719) total burden hours. This is a decrease of 1,821,491 total annual responses and an increase of 269,287.02 (269,287) total burden hours. This is due to a revision of estimates based on current data, and the removal of burden associated with the Program Activity Statement FNS 366B, resulting in a decrease of 1,855 burden hours and 53 total annual responses from the overall total. The overall decrease in this collection is due to a program

change where estimates were updated and the Program Activity Statement (FNS 366B) was merged with OMB# 0584-0594 (Exp. 07/31/2023).

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 for publication.

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 on the Program Activity Statement.

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.