

Supporting Statement
Supplemental Nutrition Assistance Program
Repayment Demand and Program Disqualification
OMB Control Number 0584-0492

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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 the currently approved information collection associated with initiating collection actions against households who received an overissuance in the Supplemental Nutrition Assistance Program (SNAP), issuing notifications to SNAP households regarding processes related to intentional program violations (IPV), and using disqualified recipient data to ascertain the correct penalty for IPVs, based on prior disqualifications.

Initiating Collection Action - Section 13(b) of the Food and Nutrition Act of 2008, as amended (7 U.S.C. 2022(b)), and Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.18(a)(2) require State agencies to initiate collection action against households that have been overissued benefits. To initiate collection action, State agencies must provide the affected household with written notification informing the household of the claim and demanding repayment. This process is automated in most State agencies. Note that for overissuance claims, this information collection only covers the activities associated with initiating collection. The burden associated with reporting collections and other claims management information on the FNS-209 form is covered under currently approved under the Food Program Reporting System OMB number 0584-0594, expiration date 7/31/2023. The burden associated with referring delinquent claims and receiving collections through the Treasury Offset Program is covered under currently approved OMB number 0584-0446, expiration date 11/30/2022.

Intentional Program Violation Notification - SNAP regulations at 7 CFR 273.16(a)(1) require State agencies to investigate any case of suspected fraud and, where applicable, make an intentional Program violation (IPV) determination either administratively or judicially. This activity is vital to protect and enhance the integrity of SNAP. Notifications and activities involved in the IPV process include:

- 7 CFR 273.16(e)(3) - The State agency providing written notification informing an individual suspected of committing an IPV of an impending administrative disqualification hearing or court action;
- 7 CFR 273.16(f)(2) and 273.16(h)(2) - An individual opting to accept the disqualification and waiving the right to an administrative disqualification hearing or court action by signing either a waiver to an administrative disqualification hearing or a disqualification consent agreement in cases of deferred adjudication and returning it to the State agency; and
- 7 CFR 273.16(e)(9) - Once a determination is made regarding an IPV, the State agency sending notification to the affected individual of the action taken on the administrative disqualification hearing or court decision.

Accessing, Reviewing, and Updating Disqualified Recipient Data - SNAP regulations at 7 CFR 273.16(i)(4) require State agencies to use disqualified recipient data to ascertain the correct penalty for IPV, based on prior disqualifications. State agencies determine this by accessing and reviewing records located in the Electronic Disqualified Recipient System (eDRS). eDRS is an automated system developed by FNS that contains records of disqualifications in every State. State agencies are also responsible for updating the system, as required at 273.16(i)(2)(i), which

includes reporting disqualifications in eDRS as they occur and updating eDRS when records are no longer accurate, relevant, or complete.

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.

Initiating Collection Action – To initiate collection action, SNAP regulations at 7 CFR 273.18(a)(2) require all 53 State agencies to provide written notification as needed to all households that were overissued SNAP benefits informing them of the claim and a demand for repayment. This process is automated in most State agencies. The notification must conform to the requirements of 7 CFR 273.18(e)(3)(iv) to include the data below:

- The amount of the claim;
- The intent to collect from all adult household members;
- The type of and reason for the claim;
- The time period associated with the claim;
- How the claim was calculated;
- A listing of payment procedures and applicable options;
- A listing of appeal and due process rights; and
- A listing of actions that may be taken if the claim is not timely paid.

Intentional Program Violations (IPV) – SNAP regulations at 7 CFR 273.16(a)(1) require State agencies to investigate any case of suspected fraud, and, where applicable, make a determination of an IPV either administratively or through the court. A State agency may determine an IPV by:

- The individual accepting the penalty by signing a waiver of right to an administrative disqualification hearing (ADH);
- The individual signing a disqualification consent agreement in cases of deferred adjudication; or
- An administrative hearing official or a court of appropriate jurisdiction determining that the individual committed the IPV.

SNAP regulations at 7 CFR 273.16(e)(3) require that State agencies provide written notification of an impending ADH to the individual suspected of committing an IPV. The notification contains an explanation of the charge against the individual, the potential penalties, and a listing of the rights and options afforded to the individual. A similar notification is sent to individuals who are being prosecuted through the court.

In some State agencies, one of the options available to the individual under 7 CFR 273.16(f)(2) is the ability for the individual to waive the right to an ADH and accept the disqualification penalty. The disqualification waiver may be included in the advance notification or provided as a separate attachment for the individual to sign and submit to avoid having the ADH. Similarly, under 7 CFR 273.16(h)(2), State agencies may establish procedures to provide the accused individual with the option to consent to a Program disqualification to avoid criminal prosecution.

Once a determination is made regarding an IPV, the State agency must send notification to the affected individual of the action taken on the ADH or court decision, as required at 7 CFR

273.16(e)(9). This includes notifying the person that he/she will be disqualified and when the disqualification will become effective.

One of the factors used by a State agency to determine the appropriate disqualification penalty to assign to an individual is whether or not the individual was found to have committed any prior IPV's. The way that State agencies determine this is by accessing and checking the Electronic Disqualified Recipient System (eDRS). eDRS is an automated system developed by FNS that contains records of disqualifications in every State. Per 7 CFR 273.16(i)(4) State agencies are responsible for checking eDRS to determine the appropriate length of each disqualification.

7 CFR 273.16(i)(2)(i) requires State agencies to update the eDRS system, which includes reporting disqualifications as they occur and removing records which are no longer accurate, relevant, or complete. States have a choice between using a batch process for correcting and resubmitting data or submitting data directly through the eDRS website. Data entry errors are identified at the point of entry and corrections can be made immediately.

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 is committed to complying with the E-Government Act, 2002 to promote the use of technology. Federal agencies are to provide for electronic submission of information as an alternative to paper submission. State agencies have the authority to use information technology that best suits the needs of their individual or unique systems of operations to comply with this

information collection. For initiating collection action, this process is automated in most State agencies. The tracking and notification process for IPV's is also automated in most State agencies. FNS makes every effort to comply with these requirements for this information collection. eDRS is an automated system developed and maintained by FNS and is made available to all 53 State agencies so that they may submit and retrieve data efficiently; 100 percent of the States submit data electronically at <https://www.edrsng.fns.usda.gov/Default.aspx>. see eDRS Screenshots (Appendix B).

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.

Based on research conducted during the life cycle of this information collection, there was no other information collection that existed that would serve the Agency's purpose. To ensure program integrity, FNS solely monitors overissuance and intentional violations of SNAP benefits. The information required for eDRS and repayment demands is not currently reported to any other entity outside of FNS. 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.

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.

The information required has been held to the minimum requirement for the intended use.

Circumstances limit the flexibility in modifying the reporting and recordkeeping requirements to

comply with statutory requirements and to protect Program integrity. There are no small businesses involved in this data 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 an ongoing mandatory data collection. If FNS did not initiate overissuance collection actions, the Federal program would not be in compliance with Federal regulations.

Additionally, claims collections have a direct financial impact on both State and Federal government. If these overissuances were not identified and households not notified about overissuances, both entities stand to lose an opportunity to reduce Program costs by millions of dollars. There is also a negative impact on recipients. Not adequately notifying a household of an overissuance or an impending IPV compromises the respondent's right to due process.

Further, States are responsible for assigning the appropriate penalty lengths to those found guilty of an IPV. Individuals who have committed prior IPV's are assigned longer penalty durations. States access eDRS in order to determine if any prior IPV's have been committed. States are responsible for updating the system so that it may be used for this purpose.

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 that require information collection that is inconsistent with 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.

August 31, 2020 FNS published in the Federal Register a 60-day notice 85 FR 53786 regarding this information collection. Comments were solicited on this information collection as part of the comment period of the notice. One comment (included with this request in Appendix E) was received. However, the comment was not directly related to this proposed information collection request.

FNS consults with Regional Offices regarding any proposed changes as a result of regulatory 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 disqualifications in each of the following States: The North Dakota Department of Human Services (Deborah Kramer, debkramer@nd.gov), 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 (Laura Hennings, laura.hennings@state.co.us). These State agency contacts were sent the Federal Register Notice and asked to share any feedback on the information collected related to Repayment Demand and Program Disqualification to include their views on the burden activities. They have not submitted any feedback on the information collection as of November 2, 2020.

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 to respondents are provided under this information collection.

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.

Section 11(e)(8) of the Food and Nutrition Act of 2008 and regulations at 7 CFR 272.1 limit the use or disclosure of information obtained from applicant households to persons directly connected with either the administration or safeguarding the integrity of the SNAP. The

activities covered by this action are to be used by those directly connected with the administration of SNAP. Access to records is limited to those persons who process the records or conduct research in an investigation, except as otherwise required by law. The Privacy Act of 1974 (Privacy Act), 5 U.S.C. § 552a provides additional protections for individuals whose information is included in a matching program with a Federal system or records. Pursuant to the Privacy Act requirements for computer matching agreements (CMA) at 5 U.S.C. §552a(o), the eDRS CMA governs the matching program between FNS and each State agency.

The security procedures section of the eDRS CMA specifies the following administrative safeguards for participants in the eDRS matching program. FNS and State agencies will restrict access to eDRS, the data matched, and any data created by the match to only those authorized employees and officials who need it to perform their official duties in connection with the uses of the data authorized in this CMA. Furthermore, all personnel who will have access to the data matched and to any data created by the match will be advised of the sensitive nature of the data, the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

The Privacy Act also requires that before personally identifiable information (PII), such as social security numbers, may be shared with other entities, a system of records notice (SORN) must first be published. Therefore, the Food and Nutrition Service published such a SORN on March 27, 1998 in the Federal Register Volume 63, Number 59, Page 14894, titled USDA/FNS-3 *“Claims Against Food Stamp Recipients.”*

This ICR package was reviewed and approved by FNS Privacy Officer, Miguel Marling, on March 3, 2021.

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.

State agencies are both the providers of information to eDRS and the users of such information. State agencies are required per 7 CFR 273.16(i)(3) to report specific data elements to FNS about disqualifications they impose in their States. State agencies meet this requirement by submitting the information to eDRS. The PII provided by State agencies includes the name, social security number, and date of birth of individuals who have been disqualified from receiving SNAP benefits due to an intentional program violation (IPV). State agencies are further required to conduct matches against the information in eDRS to determine if applicants are currently disqualified from receiving SNAP benefits and to ensure the proper disqualification period is imposed for a new IPV per 7 CFR 273.2(f)(11)(i)(A-B). The inclusion of PII is required to identify the affected individuals.

The Privacy Act requires the CMA to specify procedures for providing individual notice to applicants for and recipients of financial assistance or payments under Federal benefit programs that any information provided by applicants and recipients may be subject to verification through matching programs. Such notice is required at the time of application and periodically thereafter, as directed by the Data Integrity Board (DIB) of the USDA, subject to guidance provided by the

Director of OMB per the Privacy Act, section (o)(1)(D)(i), and 7 CFR 273.2(b)(4)).

Pursuant to this requirement, State agencies have implemented procedures and developed forms for providing individualized notice as required. Methods for notification include, but are not limited to: a statement on the initial application for SNAP benefits (hard copy and electronic); an explanation in the benefit program handbook provided at the time of application; a banner on the State agency website for SNAP applicants and SNAP renewal; and/or a statement in letters to applicants and recipients of SNAP assistance. Such procedures are in accordance with directions by the DIB, subject to guidance by Office of Management and Budget (OMB).

This ICR package was reviewed and approved by FNS Privacy Officer Miguel Marling on March 3, 2021.

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 respondents and affected public is 53 State, Local and Tribal Government agencies and 559,785 individuals/households, for a total of 559,838 respondents. There is an estimates 3.63292 responses per respondent for a total of 2,033,844.64 responses. The estimated reporting time per response per State agency and household is .06664 hours (4 minutes) for a total of 135,525.984 burden hours under this collection. There is no third party disclosure

associated with this information collection.

The State agency burden consists of seven major reporting components. It covers (1) Demand Letters for Overissuance, (2) Notices for Hearing or Prosecution, (3) Action Taken on Hearings or Court Decisions for IPV findings, (4) Action Taken on Hearing or Court Decision for No IPV Findings, (5) eDRS system breakout reporting, (6) Editing and Resubmissions to eDRS, and (7) Penalty Checks using eDRS mainframe. The total estimated burden for all State agency burden is approximately 93,348.23 hours. The calculation of the burden for each of these components is described below:

- (1) Demand Letters for Overissuance: Fifty-three (53) State agencies issue approximately 10,561.98 demand letters for overissuance for a total of 559,786 responses. At .1336 hours (8 minutes) per response, the annual burden for this activity is 74,787.276 hours.
- (2) Notices for Hearing or Prosecution: Fifty-three (53) State agencies issue approximately 807.34 notices for hearing or prosecution for a total of 42,789 responses. At .1336 hours (8 minutes) per response, the annual burden for this activity is 5,716.61 hours.
- (3) Action Taken on Hearings or Court Decisions for IPV findings: Fifty-three (53) State agencies will take action on hearings or court decisions in approximately 815.40 instances for a total of 39,097 responses. At .167 hours (10 minutes) per response, the annual burden for this activity is 6,529.199 hours.
- (4) Action Taken on Hearing or Court Decision for No IPV Findings: Fifty-three (53) State agencies will take action on hearings or court decision for no IPV findings in approximately 69.66 instances for a total of 3,692 responses. At .0835 hours (5 minutes) per response, the

annual burden for this activity is 308.282 hours.

- (5) eDRS system breakout reporting: Fifty-three (53) State agencies will report on eDRS in approximately 737.68 instances for a total of 39,097 responses. At .0835 hours (5 minutes) per response, the annual burden for this activity is 3,264.60 hours.
- (6) Editing and Resubmissions to eDRS: Fifty-three (53) State agencies will edit and resubmit information to eDRS in approximately 88.52 instances for a total of 4,691.64 responses. At .167 hours (10 minutes) per response, the annual burden for this activity is 783.504 hours.
- (7) Penalty Checks using eDRS mainframe: Fifty-three (53) State agencies will use the eDRS mainframe for penalty checks in approximately 737.68 instances for a total of 39,097 responses. At .0501 hours (3 minutes) per response, the annual burden for this activity is 1,958.76 hours.

State agency recordkeeping burden consists of two major components: (1) Recordkeeping for initiating collection action, (2) Recordkeeping for IPVs. The total estimated burden for all State agency recordkeeping is approximately 21,431.811 hours. The calculation of the burden for each of these components is described below:

- (1) Recordkeeping for Initiating Collection Actions: Fifty-three (53) State agencies will keep records for collection actions in approximately 10,561.98 instances for a total of 559,785 annual records. At .0334 (2 minutes) hours per response, the estimated annual burden for this activity is 18,696.819 hours.
- (2) Recordkeeping for IPVs: Fifty-three (53) State agencies will keep records for IPVs in approximately 1,545.02 instances for a total of 81,886 annual records. At .0334 (2 minutes) hours per response, the estimated annual burden for this activity is 2,734.992 hours.

The household reporting burden consists of six major reporting components. It covers (1) Responding to a Demand Letter for Overissuance, (2) Responding to a Notice for Hearing or Prosecution, (3) Responding to an Administrative Disqualification Hearing Waiver, (4) Responding to a Disqualification Consent Agreement, (5) Household Action on Hearing or Court Decision for IPV Finding, (6) Household Action on Hearing or Court Decision for No IPV Finding. The total estimated household burden is approximately 20,745.942 hours. The calculation of the burden for each of these components is described below:

- (1) Responding to a Demand Letter for Overissuance: An estimated 559,785 households will respond to a demand letter for overissuance one time for a total of 559,785 responses. At .0334 (2 minutes) hours per response, the estimated annual household burden for this activity is 18,696.819 hours.
- (2) Responding to a Notice for Hearing or Prosecution: An estimated 42,789 households will respond to a Notice for a Hearing or Prosecution one time for a total of 42,789 responses. At .0167 (1 minute) hours per response, the estimated annual household burden for this activity is 714.576 hours.
- (3) Responding to an Administrative Disqualification Hearing Waiver: An estimated 15,664 households will respond to an administrative disqualification hearing waiver one time for a total of 15,664 responses. At .0334 (2 minutes) hours per response, the estimated annual

There [is or is no] third-party disclosure reporting associated with this information collection request.

Title	CFR Section of Regulations	Estimated # Respondents	Responses Per Respondent	Total Annual Responses (Col. DxE)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. FxG)	Hourly Cost to Respondent	Estimated Cost to Respondent	Fully Loaded Wages	Previously Approved	Due to Program Change	Due to an Adjustment	Total Difference
STATE AGENCY Reporting Burden													
Demand Letter for Overissuance	273.18(a)(2)	53	10,561.98	559,785.00	0.1336	74,787.276	\$ 11.33	\$ 847,339.84	\$ 1,126,961.98	118,171.338	0.000	-43,384.062	-43,384.062
Notice for Hearing or Prosecution	273.16(e)(3)	53	807.34	42,789.00	0.1336	5,716.610	\$ 11.33	\$ 64,769.20	\$ 86,143.03	5,374.728	0.000	341.882	341.882
Action Taken on Hearing or Court Decision: For IPV Findings	273.16(e)(9)	53	815.40	39,097.00	0.167	6,529.199	\$ 11.33	\$ 73,975.82	\$ 98,387.85	7,752.488	0.000	-1,223.289	-1,223.289
Action Taken on Hearing or Court Decision: For No IPV Findings	273.16(e)(9)	53	69.66	3,692.00	0.0835	308.282	\$ 11.33	\$ 3,492.84	\$ 4,645.47	128.674	0.000	179.609	179.609
Electronic Disqualified Recipient System Breakout: For eDRS Reporting	273.16(i)(2)(i)	53	737.68	39,097.00	0.0835	3,264.600	\$ 11.33	\$ 36,987.91	\$ 49,193.92	4,797.994	0.000	-1,533.394	-1,533.394

<i>Electronic Disqualified Recipient System Breakout: For Editing and Resubmission</i>	272.1(f)(3)	53	88.52	4,691.64	0.167	783.504	\$ 11.33	\$ 8,877.10	\$ 11,806.54	1,149.243	0.000	-365.739	-365.739
<i>Electronic Disqualified Recipient System Breakout: For Penalty Checks using Mainframe</i>	273.16(i)(4)	53	737.68	39,097.00	0.05010	1,958.760	\$ 11.33	\$ 22,192.75	\$ 29,516.35	1,938.099	0.000	20.661	20.661
Total State Agency Reporting Burden		53	13,818.261	728,248.640	0.12818	93,348.230	\$ 11.33	\$ 1,057,635.45	\$ 1,406,655.15	139,312.563	0.000	-45,964.332	-45,964.332

Recordkeeping

Title		Estimated # Recordkeepers	Records Per Recordkeeper	Annual Records	Estimated Avg. # of Hours Per Records	Estimated Total Annual Records	Hourly Cost to Respondent	Estimated Cost to Respondent	Fully Loaded Wages	Previously Approved	Due to Program Change	Due to an Adjustment	Total Difference
<i>Recordkeeping Breakout: For initiating Collection Action</i>	272.1(f)	53	10,561.98	559,785.00	0.0334	18,696.819	\$ 11.33	\$ 211,834.96	\$ 281,740.50	29,542.834	0.000	-10,846.015	-10,846.015
<i>Recordkeeping Breakout: For IPVs</i>	272.1(f)	53	1,545.02	81,886.00	0.0334	2,734.992	\$ 11.33	\$ 30,987.46	\$ 41,213.33	2,897.250	0.000	-162.257	-162.257

Total State Agency Recordkeeping Burden		53	12,107.000	641,671.000	0.0334	21,431.811	\$ 11.33	\$ 242,822.42	\$ 322,953.82	32,440.084	0.000	-11,008.273	-11,008.273
	CFR Section of Regulations	Estimated # Respondents	Responses Per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Hourly Cost to Respondent	Estimated Cost to Respondent	Fully Loaded Wages	Previously Approved	Due to Program Change	Due to an Adjustment	Total Difference
TOTAL STATE AGENCY BURDEN		53	25,847.540	1,369,919.640	0.0838	114,780.042	\$ 11.33	\$ 1,300,457.87	\$ 1,729,608.97	171,752.647	0.000	-56,972.605	-56,972.605
Title		Estimated # Respondents	Responses Per Respondent	Total Annual Responses (Col. DxE)	Estimated Avg. # of Hours Per Response	Estimated Total Hours (Col. FxG)	Hourly Cost to Respondent	Estimated Cost to Respondent	Fully Loaded Wages	Previously Approved	Due to Program Change	Due to an Adjustment	Total Difference
HOUSEHOLD Reporting Burden													
Demand Letter for Overissuance	273.18(a)(2)	559,785.00	1.00	559,785.00	0.0334	18,696.819	\$ 7.25	\$ 135,551.94		29,542.834	0.000	-10,846.015	-10,846.015

Notice for Hearing or Prosecution	273.16(e)(3)	42,789.00	1.00	42,789.00	0.0167	714.576	\$ 7.25	\$ 5,180.68		729.065	0.000	-14.488	-14.488
Administrative Disqualification Hearing Waiver	273.16(i)(2)	15,664.00	1.00	15,664.00	0.0334	523.178	\$ 7.25	\$ 3,793.04		604.941	0.000	-81.763	-81.763
Disqualification Consent Agreement	273.16(i)(2)	2,898.00	1.00	2,898.00	0.0334	96.793	\$ 7.25	\$ 701.75		228.757	0.000	-131.963	-131.963
Action Taken on Hearing or Court Decision: For IPV Findings	273.16(e)(9)	39,097.00	1.00	39,097.00	0.0167	652.920	\$ 7.25	\$ 4,733.67		707.281	0.000	-54.361	-54.361
Action Taken on Hearing or Court Decision: For No IPV Findings	273.16(e)(9)	3,692.00	1.00	3,692.00	0.0167	61.656	\$ 7.25	\$ 447.01		21.767	0.000	39.889	39.889
Total Household Reporting Burden		559,785	1.18604	663,925.000	0.03125	20,745.942	\$ 7.25	\$ 150,408.08	\$ 200,042.75	31,834.644	0.000	-11,088.702	-11,088.702

SUMMARY OF BURDEN

State Agency Level		53		1,369,919.640		114,780.042	\$ 11.33	\$ 1,300,457.87	\$ 1,729,608.97	171,752.647	0.000	-56,972.605	-56,972.605
Household		559,785		663,925.000		20,745.942	\$ 7.25	\$ 150,408.08	\$ 200,042.75	31,834.644	0.000	-11,088.702	-11,088.702
TOTAL BURDEN THIS COLLECTION		559,838	3.63292	2,033,844.640	0.06664	135,525.984		\$ 1,450,865.96	\$ 1,929,651.72	203,587.291	0.000	-68,061.307	-68,061.307

- (4) household burden for this activity is 523.178 hours.
- (5) Responding to Disqualification Consent Agreement: an estimated 2,898 households will respond to a disqualification consent agreement one time for a total of 2,898 responses. At .0334 (2 minutes) hours per response, the estimated annual household burden for this activity is 96.763 hours.
- (6) Household Action on Hearing or Court Decision for IPV Finding: An estimated 39,097 households will act on a hearing or court decision for an IPV finding one time for a total of 39,097 responses. At .0167 (1 minute) hours per response, the estimated annual household burden for this activity is 652.92 hours.
- (7) Household Action on Hearing or Court Decision for No IPV Finding: An estimated 3,692 households will act on a hearing or court decision for no IPV finding one time for a total of 3,692 responses. At .0167 (1 minute) hours per response, the estimated annual household burden for this activity is 61.656 hours.

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 \$1,729,609. 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 budget analyst functions performed by State and local agency staff are valued at \$37.56 per staff hour.

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 **\$1,732,761.60** including 33 percent of the annual base cost to respondents to capture fully loaded wages. This cost includes \$1,729,609 reimbursable rate paid to State agencies + \$3,152.6 the total cost of Federal workers (\$827.40 for FNS Management analyst and \$2,325.20 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 Management Analyst	20	\$41.37	\$827.4
GS-14 Branch Chief	40	\$58.13	\$2,325.2

Cost of Federal workers:

\$3,152.6

*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)

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 is a revision of a currently approved collection. The current burden inventory for this information collection request is 203,587 total annual burden hours and 3,051,894 total annual responses.

FNS is requesting 135,525.984 burden hours and the total annual responses are 2,033,844.64.

The revised burden estimates have decreased from 203,587 to 135,525.984 burden hours, for an overall decrease of 68,061.02 burden hours. This decrease is attributed to program adjustments reflecting fewer notices, fewer demand letters, and fewer IPV's.

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.

Aggregate data on the number of claims established and disqualification are included in the SNAP State activity report that is released on an annual basis on the United States Department of Agriculture web site.

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.

There is no form associated with this information collection; therefore, this submission is not seeking OMB approval to not display the expiration date. This information collection plans to display the OMB control number and expiration date on the database home page. As referenced, appendix B contains a screenshot of eDRS system.

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.