

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0660:

Pandemic Electronic Benefit Transfer

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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.

The Families First Coronavirus Response Act of 2020 (FFCRA, P.L. 116-127), enacted March 18, 2020, included a general provision that allows the Department of Agriculture to approve state plans to provide temporary emergency Supplemental Nutrition Assistance Program (SNAP) assistance to households with children who would otherwise receive free or reduced-price meals if not for their schools being closed due to the COVID-19 emergency (also known as Pandemic EBT, or P-EBT). The authority for P-EBT under FFCRA expired on September 30, 2020. The Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), enacted October 1, 2020 extended the authority for P-EBT through September 30, 2021. This legislation also expanded the program to include child care facilities affected by the closures and schools with reduced attendance hours. The Consolidated Appropriations Act, 2021 (PL 116-260), enacted December 27, 2020, provided additional eligibility requirements and State flexibilities for both school and child care components of this program. The American Rescue Plan Act, 2021 (PL 117-2) enacted March 11, 2021, added a summer component to P-EBT for school children and children in child care and extended P-EBT through the end of COVID-19 emergency declaration.

This is a revision of the currently approved information collection for Pandemic EBT (Schools) associated with OMB control number 0584-0660. Previously FNS sought an emergency IC for P-EBT under FFCRA (OMB Control Number 0584-0652, expiration January 31, 2022). After P-EBT was extended under the Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), enacted October 1, 2020, FNS submitted an emergency IC, for Pandemic EBT

(Schools) associated with OMB control number 0584-0660 which was approved through August 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.

This information collection is necessary to ensure that households impacted by COVID-19 receive emergency food assistance and that State agencies and schools receive reimbursement of their administrative costs. State agencies, schools, and households are required to submit the information covered under this information collection in order to obtain benefits.

P-EBT

As authorized by the Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), and amended by Consolidated Appropriations Act, 2021, States impacted by COVID-19 have the ability to issue P-EBT benefits to SNAP (currently participating in SNAP) and non-SNAP (not currently participating in SNAP) households with children who have temporarily lost access to free or reduced-price school meals due to pandemic related school closures, reduced school hours, or reduced school attendance. These households are eligible for P-EBT if they meet the following eligibility standards:

- Households include a child or children who, if not for a COVID-19 related school closure, reduced school hours, or reduced school attendance, would have received a receive free or reduced-price school meals under the Richard B. Russell National School Lunch Act, as amended, and
- The child's school has been closed, had reduced hours, or reduced attendance due to pandemic for at least 5 consecutive days.

The household allotment amount will be no less than the value of school meals at the free rate over the course of five (5) school days for each eligible child in the household. The value of the school meals is equal to the Federal reimbursement rate for breakfast and lunch and a snack at the free rate. The number of days of benefits children receive is dependent on their number of days of virtual education. In States where it was not administratively feasible to determine benefits at an individual level, the number of benefits were typically based on the predominant number of days of virtual education at the school level. The statute also authorizes the issuance of benefits to SNAP-recipient children who are enrolled in certain child care programs and are unable to attend care due to the closure, reduced attendance, or reduced hours of the child care provider. Children in child care may also be eligible for benefits if the provider is in the area of a school that is closed or operating at reduced attendance or hours. The number of days of benefits were generally based on the number of days of benefits school children in the area were receiving, with some States opting to issue benefits based on the statewide average school P-EBT benefit. The American Rescue Plan Act, 2021 (PL 117-2) enacted March 11, 2021, added a summer component to P-EBT for school children and children in child care. For the summer component, school children are eligible if they were and were enrolled in a National School Lunch Program participating school as of the last month of the school year considered eligible for free/reduced price meals during school year 2020-2021 or were newly determined eligible during summer 2021. Child care children are eligible for the summer component if a child is under 6 and is a member of a SNAP participating household during Summer 2021.

USDA expects States to identify the vast majority of school children eligible to receive P-EBT benefits through enrollment data from local educational entities, and matching them to an existing SNAP case, where applicable. In cases where enrollment data is insufficient to identify P-EBT eligible children, USDA expects States to identify children that are potentially eligible for P-EBT benefits through use of an application process. For the child care component, enrollment in SNAP is a requirement for eligibility. States used their existing SNAP data to determine which children were eligible and used their data on the benefits issued to school children to determine benefit levels for children in child care.

Per PL 116-159, and in order to operate P-EBT for School Year (SY) 2020-2021, each State must submit a State plan to FNS Regional Office for approval (Attachment C). State are required to submit a separate plan covering the summer months (Attachment D). States are required to send FNS updates in cases where issuance dates identified in State plans were delayed and provide notice prior to issuances in order to ensure retailers had adequate notice and supply. Once approved, in addition to administering P-EBT, each State SNAP agency will also be required to provide monthly reports via the FNS-292B (*Disaster Relief*) (Attachment E) to the FNS Regional Office, regarding the number of eligible children receiving P-EBT benefits, number of households receiving such benefits, and the total value of the benefits. The State is expected to provide data that:

- differentiates between non-SNAP and current SNAP households receiving P-EBT,
- Within SNAP households, differentiate between base SNAP benefits and P-EBT benefits.

Each State is also expected to separately identify P-EBT participation and benefit issuance on the FNS-388 (*State Issuance and Participation Estimates*) (Attachment F) and FNS-46 (*Issuance*

Reconciliation Report) (Attachment G) reports. There is no additional burden associated with this requirement, as the States already report participation data to FNS on the FNS-388 and FNS-46 on a monthly basis. FNS also required States to report the number of children issued benefits under the summer component and the amount of benefits issued. At the time of the 60-day notice, FNS had not yet determined that separate reporting would be necessary for summer P-EBT. Burden associated with reporting on summer issuances has been added but was not included in the 60-day notice. This increased the burden from the amount in the 60-day Notice by 27 hours.

FNS will provide funding to each State's SNAP State agency for 100% of P-EBT-related administrative costs. Such funding will be available for the necessary, allowable, and reasonable State agency and school costs associated with the administration of P-EBT incurred during FY 2021. This includes administrative costs associated with the issuance of retroactive FY 2020 benefits incurred in FY 2021. States interested in the 100% funding will be expected to submit a P-EBT administrative cost plan for the intended period of operations for USDA approval using the FNS-366A (*Program and Budget Summary Statement: Budget Projection*) (Attachment H). In order to receive local level funding, schools were required to submit their costs to the SNAP state agency. During the period of performance of the 100% funding, the SNAP State agency will be expected to aggregate obligation and outlay data from all State agencies and schools utilizing the 100% funding and report quarterly to USDA using a P-EBT specific instance of the SF-425 (*Federal Financial Report*) (Attachment I).

The current burden for a State agency to submit FNS-292B, FNS-388, FNS-46, FNS-366A and

SF-425 reports is currently captured under the information collection for the Food Programs Reporting System (FPRS), OMB Control Number 0584-0594 (expiration date 7/31/23). The Food Programs Reporting System is the Federal System State agencies use to report FNS Program data to FNS. Therefore, this information collection estimates burden hours associated with P-EBT that are above the currently approved hours in 0584-0594 for forms FNS-292B, FNS-366A, and SF-425 for normal Program operations.

This collection added new burdens to account for the critical role that schools play in P-EBT. In order for households to receive P-EBT benefits during school year 2020-2021, schools were required to provide State agencies with free/reduced price eligibility data as well as data on the number of virtual learning days each month. States collected this information in a variety of ways including providing websites for schools to upload their data, providing templates for reporting data, and through ad hoc collections. In order for households to receive P-EBT benefits during summer 2021, schools were required to provide State agencies with free/reduced price eligibility data. In order to receive local level funding, schools were required to submit their administrative costs to the SNAP state agency.

This collection includes a reduced burden for households related to completing free and reduced price meal applications. As permitted under the Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), enacted October 1, 2020, States were able to use their best feasibly available eligibility data, which allowed eligibility from school year 2019-2020 to be used during school year 2020-2021. Households had the option to complete applications if they had not been previously determined eligible for free/reduced price meals.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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

All State agencies have automated their SNAP eligibility systems. States send aggregate level data on participation, benefits issued, and other basic program information to FNS using the Food Programs Reporting System (FPRS) via this website: <https://fprs.fns.usda.gov>. FNS does not receive client-specific data, such as applications or individual case records. It is estimated that most households will be able to apply electronically for P-EBT. The State processing of P-EBT is fully electronic.

States have discretion in determining data collection mechanisms to collect data from schools. Due to the increase in remote operations during COVID-19, FNS expects all data was submitted fully electronically.

Schools are required to make paper applications available upon request, but are permitted to use

electronic applications. FNS expects some households chose to submit paper applications while others submitted applications electronically. FNS does not expect that households experience a difference in the time needed to complete applications between the paper and electronic applications.

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.

States are required to limit any collection of information to only what is necessary to comply with statutory SNAP requirements and to protect program integrity without imposing undue burden on respondents. Because of the numerous Federal or State means-tested programs with variations in eligibility rules and benefit criteria, duplication of information collection and reporting may result for both States and households. Schools obtain eligibility information for free school meals directly from other agencies, such as SNAP, TANF, FDPIR, and foster care agencies to reduce duplicative paperwork for households who have already established their need for assistance through other programs that serve low-income children. Households are required to submit sensitive information including child name, adult name, adult last 4 digits of SSN, child income, adult income, and receipt of public assistance. This information is statutorily required to be on household applications by the Sec. 9(b)(3) of the NSLA.

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.

Of the entities impacted by this information collection, FNS estimates 99.94% are small entities. State agencies administer SNAP at the State level and collect the necessary data to ensure correct

eligibility determinations and delivery of benefit. Of the 53 SNAP State agency respondents, none are small entities. Schools generally meet the definition of a “small governmental jurisdiction,” which meets the definition of “small entity” in the Regulatory Flexibility Act. Information being requested or required has been held to the minimum necessitated by Federal requirements.

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.

In order to certify households for SNAP under pandemic circumstances, the collection of certain information is necessary. FNS has limited the collection of information to the minimum amount required to comply with the intent of standards set forth in the Food and Nutrition Act of 2008, as amended. Additionally, if the necessary information is not collected, participating households in P-EBT could not be properly tracked, resulting in the over- or under-issuance of benefits to ineligible households.

The Families First Coronavirus Response Act of 2020 (FFCRA, P.L. 116-127), enacted March 18, 2020 required that benefits for school children be based on whether children were experiencing a loss or reduction in access to school meals. Because schools were moving from operating fully virtually to operating in-person where students had access to school meals, it was necessary for States to collect data from schools every two months to confirm whether children had experienced a loss or reduction in access to school meals. If this information had been collected less frequently, P-EBT would not be able to provide accurate benefits to children

whose learning model changed during the course of the school year.

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.**

The monthly reporting of P-EBT participation is standard for disaster/event protocols and is intended to assist with accurately tracking and reporting activity to Congress and the Executive Office of the President.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-Day Notice concerning this revision was published in the Federal Register on May 11, 2020 (Volume 86, Number 89, pages 25837-25839). The comment period for the information collection ended on July 12, 2021. FNS received one comment in response to the agency's notice. The commenter noted that PEBT reporting places a huge burden on a district's business office and food service departments. While previous the previously approved burden for the Pandemic EBT IC did not include burdens related to activities carried out by schools, this revision recognizes the significant burden placed on schools. In the 60-day notice, FNS estimated that 710,753 burden hours for schools to report information necessary for administering P-EBT. The comment confirms that this revision to OMB 0584-0660 appropriately adds burden to account for the reporting activities at the school level.

The Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), enacted October 1, 2020 and The Consolidated Appropriations Act, 2021 (PL 116-260), enacted December 27, 2020, provided additional eligibility requirements and State flexibilities. States were required to submit plans detailing their proposed process for administering P-EBT. As a part of their plan, States were permitted to propose simplifying assumptions based on their best feasibly available data. This enabled States to consider what data was appropriate based on their

particular State data environment. FNS reached out to 3 individual State directors to specifically request their feedback on the appropriateness of the burdens identified for State agencies.

Contacts included:

- Adrienne Shields, Director, Indiana Family and Social Services Administration ,
Adrienne.Shields@fssa.IN.gov
- Melissa Conner, Associate Superintendent, Health and Nutrition Services Division
Arizona Department of Education, Melissa.Conner@azed.gov

These contacts either responded that they were electing to not provide feedback or did not provide a response.

- Angelice Lowe, MBA, Child Nutrition Programs Director, Alabama State Department of Education, alowe@ALSDE.edu

This contact noted several areas where they indicated the estimates in the information collection did not adequately account for the burden hours required of schools and state agencies in order to administer P-EBT. Based on their feedback, FNS has increased the burden hours from the estimated amounts in the 60-Day Notice for the burdens associated with schools providing eligibility data to State agencies and the burdens for State agencies determining eligibility and completing administrative costs plans. The total increase in burden related to comments received is 12,844,601 burden hours.

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 under this 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 Act and 7 CFR 272.1(c) of SNAP regulations limit the use or disclosure of information obtained from applicant households or contained in case files of participating households to persons directly connected with the administration of SNAP, such as: other Federal or federally-assisted means-tested programs; persons directly connected with the verification of immigration status of aliens; the Office of the Comptroller General of the U.S. for audit and examination authorized by any other provisions of law; local, State, or Federal law enforcement officials for the purpose of investigating an alleged violation of the Act or regulations; agencies of the Federal Government for purposes of collecting the amount of an over issuance from Federal pay; and any Federal, State or local law enforcement officer if a household member is a fleeing felon or a parole violator. The application for benefits contains personal identifying information on individuals doing business with FNS. Therefore, FNS published a Privacy Act Notice System of Records Notice (SORN) March 31, 2000, entitled USDA/FNS-10: Persons Doing Business with the Food and Nutrition Service, in the Federal Register (65 FR 17251) to specify the uses to be made of the information collected.

Section 9 of the NSLA, 42 U.S.C. 1758, and title 7 CFR 245.6 limit the disclosure of all student eligibility information obtained through the free and reduced price meals (including all information on the application or obtained through direct certification). Only the Comptroller General of the U.S. for purposes of audit and examination; federal, state, and local law enforcement officials for the purpose of investigating any alleged violation of the programs; and persons directly connected with the administration or enforcement of the SBP, NSLP, and can obtain, as appropriate, all eligibility information solicited via household applications or direct certification methods without parental consent. Information retrieved by direct certification methods, such as information that a household is receiving benefits from SNAP, FDPIR or TANF or that a child is participating in another program which makes children categorically eligible for free school meals or free milk, must be used solely for the purposes of determining children's eligibility for free school meals or free milk. Additionally, title 7 CFR 245.6(f) (2) limits the disclosure of the names of program participants and their eligibility status (whether they are eligible for free or reduced price meals or free milk). State agencies and LEAs may disclose, as appropriate, only the names and eligibility status of participants to persons directly connected with the administration or enforcement of a federal education program; a state health program or state education program administered by the state or LEA; a federal, state, or local means-tested nutrition program with eligibility standards comparable to the NSLP; or a third party contractor assisting in verification of eligibility efforts by contacting households who fail to respond to requests for verification of their eligibility. These limited disclosures assist program operators determine participant eligibility efficiently and administer the SBP, NSLP, and SMP while providing confidentiality to respondents. Disclosure is required to be in written

form, typically with consent forms designed by schools. Schools are responsible for following confidentiality requirements found at 7 CFR 245.6(f).

The penalties for unauthorized disclosure or misuse of information is specified in 7 CFR 245.6(k): “In accordance with section 9(b)(6)(C) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1758(b)(6)(C)), any individual who publishes, divulges, discloses or makes known in any manner, or to any extent not authorized by statute or this section, any information obtained under this section will be fined not more than \$1,000 or imprisoned for up to 1 year, or both.”

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.

The USDA has a responsibility to comply with Federal requirements set forth by Title VI of the Civil Rights Act of 1964. Title 28 CFR Part 42 *Subpart C—Nondiscrimination in Federally Assisted Programs—Implementation of Title VI of the Civil Rights Act of 1964* requires recipients of Federal financial assistance, such as state agencies, LEAs, and schools, to maintain and provide racial and ethnicity data upon request to FNS, showing the extent to which members of minority groups are participants of federally funded programs, such as the SBP and NSLP. Therefore, household applications for free and reduced price school meals and free milk provide program applicants the option to identify the race and ethnicity of program participants. While

household applications solicit this information, applicants are ensured that failure to provide race and ethnicity data will not affect students' eligibility to participate in the SBP, NSLP, or P-EBT.

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.

Based on the availability to use the best available data, including the most recent eligibility determination, FNS expects most children will receive P-EBT automatically. FNS estimates that 581,000 households have newly become eligible for free and reduced price meals and would need to submit an income application in order to receive P-EBT benefits.

FNS expects all schools (94,767) will provide data for the administration of pandemic EBT.

FNS expect 53 State agencies will choose to operate the P-EBT program and 53 State agencies will opt for 100% Federal reimbursement. The table below demonstrates the estimated frequency and burden associated with activities associated with operating the P-EBT program and reporting data to FNS.

The total requested burden hours for this collection is 16,529,556. The total requested number of annual responses is 9,810,662. See table below for calculations.

Respondent Category	Instruments	Form	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Previously Approved Annual Burden Hours
Individuals / Households	P-EBT Application Submission	N/A	581,000	1	581,000	0.166666667	96,833	276,666.70
Schools	Student Eligibility Data (School Year)	N/A	94,767	4	379,068	20	7,581,360	0.00
	Student Eligibility Data (Summer)	N/A	94,767	1	94,767	1	94,767	0.00
	P-EBT Local Level Administrative Cost Reporting to State	N/A	94,767	1	94,767	1	94,767	0.00
Schools Subtotal			94,767	2	568,602	7.33	7,770,894	0.00
State Agencies	State Plan Submission - P-EBT (school year 2020-2021)	Attachment C	53	1	53	1	53	53.00
	State Plan Submission - P-EBT (Summer)	Attachment D	53	1	53	1	53	0.00
	P-EBT Household Eligibility Determination	N/A	53	163,396	8,660,000	1	8,660,000	415,000
	Monthly P-EBT Reporting to FNS	FNS-292B	53	12	636	1	636	636.00
	P-EBT Administrative Cost Plan (100% funding)	FNS-366A	53	1	53	16	848	530.00
	P-EBT Quarterly	SF-425	53	4	212	1	212	212.00

	Administrative Cost Report (100% funding)							
	P-EBT Reporting to FNS (Summer)	N/A	53	1	53	0.5	27	0
SA Subtotal			53	163415.226	8,661,060	1	8,661,829	416,431
Grand Total			675,820	14.517	9,810,662	1.685	16,529,556	693,097.70

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

SNAP information collection requirements described herein are imposed primarily on State agency eligibility workers and State agency SNAP managers. Standard wage rate categories used in determining annualized burden costs were based on the most recent Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data from May 2020, using the corresponding occupation code 11-9151, Social and Community Services Managers¹. According to the most recent BLS data, workers in this occupation earn a mean wage rate of \$36.13 per hour. When this wage is fully loaded (wage + wage*.33) States would incur an annualized administrative cost of \$48.05 per hour burden in the information collection. \$48.05 x 8,661,829 burden hours equals \$ 416,225,978.73 cost to respondent. For schools, the estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Statistics, Occupational Group (25-0000)². The hourly mean wage (for education-related occupations) for functions performed by

¹ <https://www.bls.gov/oes/current/oes119151.htm>

² <http://www.bls.gov/oes/current/oes250000.htm>

State agency and LEA staff are estimated at \$28.75 per staff hour. When this wage is fully loaded (wage + wage*.33) Schools would incur an annualized administrative cost of \$38.24 per hour burden in the information collection. \$38.24 x 7,770,894 burden hours equals \$ 297,139, 559.33 cost to respondents. However, it is expected that all participating State agencies and schools will elect to receive 100% funding by the Federal government, which will result in \$0 cost.

The Federal minimum wage rate of \$7.25 per hour is used to calculate annualized costs for households applying for SNAP benefits.³ \$7.25 * 96,833 burden hours equals \$ 702,041.67 in cost to respondent.

A summary of annualized costs for the collection is shown in the table below. A detailed calculation is included in the Burden Table (Appendix A).

Respondent	Cost*
State Agencies	\$0
Schools	\$0
Households	\$702,041.67
Total	\$702,041.67

*State agency and school estimates are inflated by 33% to represent fully loaded wages

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.

FNS does not expect any additional annual cost burden to respondents or recordkeepers.

A14. Provide estimates of annualized cost to the Federal government.

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

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.

It is expected that 53 State agencies will elect to receive 100% Federal reimbursement of the administrative costs incurred by State. Thus, full administrative cost of operating the P-EBT program will be incurred by the Federal government. Costs associated with the burden imposed on SNAP applicants are not reimbursed. A detailed calculation is included in the Burden Table (Appendix A).

The Federal cost assumes it will take Regional or National Office staff (GS-12 Step 2) approximately 1 hour to review and approve each waiver request. This includes Federal worker time at FNS for the following:

	Hours	Hourly Wage Rate*	Total
GS-12/2 Program Analyst	106	\$42.75	\$4,531.50
+ 33% for Staff Fringe Benefits			\$1,495.40
100% Federal Share of State Cost			\$19,894,408.02
Total Federal Cost			\$19,895.903.42

*Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx)

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. This submission includes significant changes to the previous collection. This revision reduces the number of households expected to be required to respond in order to receive P-EBT benefits based on the flexibilities in eligibility

data authorized by the Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), enacted October 1, 2020. The approved burden for households completing applications currently approved for 276,666.70 hours is reduced to 96,833, a reduction of 179,833.37 hours due to adjustment.

This revision adds burden to account for school reporting requirements. Currently, there are no burden hours approved for schools. This revision adds 7,770,894 burden hours related to school reporting requirements. These additions are due to program changes.

This revision adds and revises burdens for State agencies. This collection adds burden for the administration of Summer P-EBT. There are 53 burden hours added for the submission of State Summer P-EBT plans and 27 hours for reporting on Summer P-EBT issuances. Additionally, the burden for completing administrative costs plans has been increased to account for the addition of summer P-EBT. Currently, administrative costs plans are approved for 530 burden hours. This revision increases the burden by 318 hours for a new total of 848 burden hours. FNS also increased the burden associated with determining eligibility. This is meant to account for the added complexity of determining benefit levels. This burden is currently approved at 415,000 burden hours. This revision adds 8,245,000 hours due to program change for a revised total of 8,660,000 burden hours for determining benefit levels. In total, the burden hours for State agencies is increased from 416,431 burden hours by 8,245,318 hours due to adjustments and 80 hours due to program changes for a total State agency burden of 8,661,829. This information collection is currently approved for 693,098 burden hours. This renewal requests an additional 7,770,974 burden hours due to program change and 8,065,484 burden hours due to adjustments

for a revised total of 16,529,556 burden hours.

A16. Plans for tabulation, and publication and project time schedule.

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

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

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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."

FNS does not have any exceptions to the certification statement.