

**SUPPORTING STATEMENT - PART A for**  
**OMB Control Number 0584-[XXXX]:**  
**Supplemental Nutrition Assistance Program (SNAP): Mobile Payment Pilots (MPPs)**

Lisa Gifaldi  
Senior Technical Advisor  
Supplemental Nutrition Assistance Program (SNAP)  
USDA, Food and Nutrition Service  
1320 Braddock Place  
Alexandria, VA 22314

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Appendix A: Section 7(h)(14) of the Food and Nutrition Act of 2008 (7 U.S.C 2016(h)(14))

Appendix B: SNAP Mobile Payment Pilot Request for Volunteers (RFV) Packet

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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 request for a new collection of information. Title 7 Section 2016 (h)(14) of the U.S. Code (“the Code”, Appendix A), as amended by Section 4006(e) of the Agricultural Act of 2018 (P.L. 115-334), requires the Food and Nutrition Service (FNS) to authorize the use of mobile payment technology for accessing Supplemental Nutrition Assistance Program (SNAP) benefits through smart phones, tablets, and other personal mobile devices in place of Electronic Benefit Transfer (EBT) cards. However, in order to implement this statutory requirement, FNS must approve up to 5 proposals from SNAP State agencies (State agencies) to conduct Mobile Payment Pilots (MPPs) that test the use of mobile payment technology in SNAP and meet several sets of requirements outlined in the Code, such as providing protections to participants that is similar to existing EBT technology, providing price parity between foods purchased with mobile payment technology and those purchased by other methods, ensuring adequate documentation and security measures to deter fraud, and other criteria as determined by FNS. After these MPPs are complete, FNS plans to publish a separate 60dayFRN and submit an evaluation collection to OMB. Due to a Congressional mandate, FNS must evaluate the data and observations collected and determine whether it is feasible to implement this technology nationwide, whether further study is required before doing so, or if implementation is not in the best interest of the program, and submit report to report to Congress with the basis of its findings. This information collection is necessary because Congress has specifically mandated that

approval and subsequent evaluation of MPPs by State agencies must occur before FNS can fulfill its broader statutory obligations to allow mobile payment technology in SNAP nation-wide.

## **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.**

To achieve the statutory obligations outlined in A1, FNS requests OMB approval under the Paperwork Reduction Act to: 1) issue a Request for Volunteers (RFV) soliciting MPP proposals from up to 53 SNAP State agencies; and 2) approve up to 5 of those State agencies that, in partnership with private, for-profit, EBT stakeholders and authorized SNAP retailers, will implement MPPs that test the use of mobile payment technology by SNAP households to access and redeem program benefits. This information collection request seeks OMB approval only for the RFV proposal process and implementation of MPPs by State agencies. FNS will seek a separate OMB approval under the Paperwork Reduction Act to evaluate the data, findings, and observations from completed MPPs. The agency plans to publish a separate 60-day Federal Register Notice and submit a NEW information collection request to OMB for the evaluation component. The process and purpose during the MPPs for each objective is detailed below.

### **1. RFV Proposal process**

FNS will issue an RFV to solicit MPP proposals from State agencies and estimates that, at maximum, up 53 State agencies will each submit one proposal in response. This collection is necessary for State agencies to receive consideration to implement MPP pilots. FNS estimates that each State agency will require 20 hours to prepare and submit their proposal and accompanying documents according to the requirements outlined in the RFV proposal packet

(Appendix B), such as a letter of intent, a detailed work plan, an application checklist, and assurances of compliance. In addition, FNS estimates that each State agency response to the RFV will require 80 hours of coordination and planning activities with SNAP EBT stakeholders, which include EBT processors, SNAP retailers, and mobile payment providers. FNS will use the information collected through this process to evaluate a State agency's proposal according to the criteria outlined in Title 7 Section 2016 (h)(14) of Code and other relevant criteria outlined in the RFV proposal packet, verify a State agency's operational capacity and technical ability to implement an MPP.

## 2. MPP Implementation

Per Title 7 Section 2016 (h)(14) of the Code, FNS will invite up to 5 State agencies with the highest rated proposals to implement an MPP. FNS will ask respondents to implement an MPP for a minimum of 9 months and a maximum of 18 months, but estimate that, because respondents may join on a rolling basis in a given year, respondents will implement an MPP for an average of 12 months. FNS estimates that each of the selected State agencies will conduct the following activities for each month of implementation of an MPP, which assumes one full-time employee working 20 hours a week in response to this information collection:

- 80 hours for designing and integrating mobile payments, and changes to current EBT systems and functionality to accommodate mobile payments,
- 80 hours for testing of EBT systems to ensure compatibility with mobile payments,
- 120 hours to provide technical assistance and support to participating SNAP households during implementation of the MPP, and

- 80 hours of coordination with EBT processors, SNAP retailers, and mobile payment providers.

FNS also estimates each of the selected State agencies will issue 1 recruitment notice soliciting participation in an MPP to 5,000 individuals who are members of SNAP households, for a total of 25,000 individuals. FNS estimates that approximately 15,000 SNAP individuals will read the notice and 10,000 will not (non-respondents). These notices may be issued electronically or via mail depending on the process used by each State agency. The notices/letters may include information about the pilot project, the basic requirements for participation, and how/where to contact the State agency to express interest in participation. Generating and issuing the 25,000 notices is expected to take approximately 3 minutes (0.05 hours) per notice. FNS also estimates that each of the 15,000 individual household members who read the recruitment notice will require up to 3 minutes (0.05 hours) to read the notice. FNS estimates that 5,000 of the recruited participants will opt to participate in the pilot (1,000 per State) and that each of the 5,000 participants will require 15 minutes (0.25) to enroll in an MPP. Potential enrollment activities for SNAP household respondents are based on the assumed model in this information collection may include calling or emailing the State agency to indicate interest, reviewing instructions, downloading a mobile application, technical assistance, and enrollment through the application. SNAP participants in the MPP would be responsible for using their own smart devices for the pilot, as necessary.

This information is necessary for State agencies, private EBT stakeholders, and SNAP household members to participate in an MPP. Through the MPPs, FNS will obtain data, observations, and findings that will allow the agency to evaluate the feasibility of integrating mobile payments with current SNAP technology and determine whether allowing mobile payments is in the best

interest of the Program, and inform best practices for making mobile payments a transaction method that is available to SNAP recipients nation-wide.

**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 the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. FNS proposes to allow State agencies interested in participating in an MPP to submit their proposals via email to a designated mailbox. Because this is a one time pilot and RFV, no new technology or systems are being developed to accept the RFVs.

**A4. Efforts to identify duplication.**

**Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies.

**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 information collection has been held to the minimum required for the intended use. There may be some small business that participate, however until the evaluation, FNS will not know

how many small entities State agencies partnered with. FNS estimates that at least 1% of respondents will be small businesses.

**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 2018 authorizes the use of a pilot as a means to determine the feasibility of a national mobile payment program and requires the submission of a report to Congress on the basis of our findings. The data collection for the proposed RFV will be conducted one time only. The information collected in the pilot evaluation (to be submitted for OMB approval under a separate information collection request) will help FNS determine the success of and best practices for the use of mobile payment technologies to redeem SNAP benefits and enable the agency to prepare the required report to Congress.

**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;**

While not a requirement to participate in the pilot, FNS expects that States and vendors may find it beneficial to meet on a regular basis to discuss project status. As such, we have included burden estimates for monthly meetings to account for this option.

- **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 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.**

FNS published a notice soliciting comments regarding this information collection on October 18, 2021 in the Federal Register at [Volume 86 Page 57634](#). The public comment period ended on December 17, 2021. FNS received one comment in response to the FR notice. The comment did

not contain information relevant to the burden collection. The comment received is included in “Appendix C: Public Comments.”

On October 20, 2021 SNAP consulted with seven individuals regarding this collection. The seven individuals/organizations consulted about the information collection are listed in the table below.

| <b>Name</b>       | <b>Job Title</b>                                 | <b>Agency</b>   | <b>Email</b>                | <b>Phone Number</b> |
|-------------------|--|---|-----------------------------|---------------------|
| Cary Jeffers      | Director of Product                              | FIS   | Cary.Jeffers@fisglobal.com  | 414-815-1380        |
| Denise Adaway     | Director of Client Management                    | Conduent  | Denise.Adaway@conduent.com  | 515-556-9445        |
| Walter Olfson     | Director of Program Management                   | Solutran  | wolfson@solutran.com        | 813-327-6866        |
| Taquanica Floyd   | Manager, Government Program & Project Management | Inmar   | taquanica.floyd@inmar.com   | 336-631-2631        |
| Thomas Pennington | Financial Administrator                          | Oklahoma Human Services                                   | Thomas.Pennington@okdhs.org | 405-830-7851        |
| Kimberly Hudson   | Benefit Programs EBT/EAP Coordinator             | Virginia Department of Social Services                    | k.hudson@dss.virginia.gov   | 804-726-7546        |
| Donald Paul       | EBT/EFT Administrator                            | Washington State Department of Social and Health Services | donald.paul@dshs.wa.gov     | 360-584-2167        |

FNS received responses from one industry contact, FIS, and two State Agencies, Oklahoma and Washington. Based on the feedback provided by one State agency and industry contact, FNS revised some of the burden estimates associated with testing activities. For both State agencies

and industry counterparts, FNS increased the estimated average hours per response for the following activity: implementation and support from 80.00 hours to 120.00 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 will be provided to respondents.

**A10. Assurances of confidentiality provided to respondents.**

**Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Department complies with the Privacy Act of 1974. There are no assurances of confidentiality associated with this collection of information.

The process for submitting data to FNS will include appropriate restrictions on the exchange of personally identifiable information (PII). FNS will use the collected information to assess the impact of a mobile payment option for the various parties involved in the pilot, identify implementation issues, and analyze program integrity concerns.

Pilot State participants must have adequate methods in place to ensure system and data security, as well as customer privacy, to prevent compromise of SNAP household privacy, identity theft, and other fraud. Applications will be carefully evaluated for strong data security systems and policies, and the use of industry-recommended practices. Due to legislative privacy requirements it is necessary for FNS to ensure that personal information such as name, address, or email address collected by SNAP Retailers is not compromised, sold, rented, or given away free to any third party without authorization. Sensitive data such as EBT card information may never be sold, rented, or given away free to third parties under any circumstances. States must address in

their agreements with all stakeholders that the parties will not share any private data with third parties for any current or future application or venture without the explicit consent of the EBT customer.

Mobile app providers may not share EBT customers' PII data or other data that could be used to identify or target EBT customers (e.g., purchase history, location data) with outside parties without the explicit permission of the EBT customer. This is true even if the terms and conditions of the app for other customers allow such data sharing. Mobile app providers must have in place a security program and best practices to protect PII data. Applicant States should require mobile app providers to detail how customers are informed of protocols for data collection, storage, protection, and sharing, including the process by which the customer may opt in or out. This information must be included in the Stakeholder Agreement. The security program described must be maintained and/or improved as long as they are participating in the mobile payment pilot. Applicant States must provide a description of data security systems, including policies and strategies that use industry-recommended practices to protect data security and customer privacy. These strategies must also prevent compromise of SNAP household privacy, identity theft and other fraud (e.g., tokenization, device fingerprinting, strong policies for required use of logon ID/passwords and format/content for handling forgotten IDs/passwords, stringent information security policies for all company and contractor personnel.) In addition to protecting data, Applicant States must describe the intended approach to gather the data that FNS will use to evaluate the mobile payment pilot (e.g., transaction data, household benefits, retailer data). The detailed approach to gathering data should include plans on how data will be shared with FNS throughout the mobile payment pilot.

The State agency agreement with mobile wallet provider(s) states that the provider must have in place a security program and follow best practices to protect all private and personally identifiable information (PII), and will be expected to maintain or improve this level of security as long as they participate in this pilot project.

FNS will also screen applications to ensure stakeholders never share PII data outside of the organization or only do so with the customer's explicit permission.

FNS will not collect or maintain Privacy Act records from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual as part of this collection. Therefore, a System of Records Notice (SORN) is not required.

Michael Bjorkman, USDA FNS Privacy Officer, reviewed this submission and indicated on February 16, 2022 that he had no privacy-related concerns.

**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 questions of a sensitive nature included in this information collection. Any sensitive information that may be associated with the MPP is collected during the SNAP application process, which is separate from the MPP. The SNAP application information collection is detailed in OMB Control Number 0584-0064, expiration 2/29/2024.

**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.**

There are three affected public (1) State, Local or Tribal Government; (2) Business-for-profit and Individuals/Households. The reporting burden for this information collection includes 25,265 unique respondent types (53 States SNAP Agencies + 53 EBT Processor + 106 SNAP Retailers + 53 Mobile Payment Vendors + 25,000 SNAP Recipients), 55,798 total annual responses (including 45,798 responses and 10,000 non-responses), and 76,902 estimated total burden hours. The estimated burden for this information collection including the number of respondents and non-respondents, frequency of response, average time to respond and annual hourly cost burden are shown in the attached Burden Table (Appendix D). Any burden associated with submitting waiver requests to FNS during the MPP is covered under OMB Control Number 0584-0083 (“Operating Guidelines, Forms, and Waivers, Program and Budget Summary Statement (Forms FNS-366A &FNS-366B)”), expiration 8/31/2023.

Since publication of the notice seeking comments on this information collection, FNS has revised its estimate of private business (as described in A2) that will support State agencies from 163 unique respondents to 212, to better represent the burden certain respondents may incur coordinating with individual State agencies for given activity. The agency did not consider travel time associated with the MPP, as travel time to retail food stores would incur for SNAP participants to shop for food items regardless of their participation in the MPP.

A summary of the burden appears below.

Table 1: Total Reporting Burden

|                              |  | Respondents |                       |                              |                        |                    |                               | Non-Respondents                     |                              |                        |                    |                               |                           |                            |                          |
|------------------------------|--|-------------|-----------------------|------------------------------|------------------------|--------------------|-------------------------------|-------------------------------------|------------------------------|------------------------|--------------------|-------------------------------|---------------------------|----------------------------|--------------------------|
| Respondent Type              | Burden Activity  | Sample Size | Number of Respondents | Annual Frequency of Response | Total Annual Responses | Hours Per Response | Total Estimated Annual Burden | Estimated Number of Non-Respondents | Annual Frequency of Response | Total Annual Responses | Hours Per Response | Total Estimated Annual Burden | Grand Annual Burden Hours | Hourly Cost (Fully Loaded) | Total Annual Burden Cost |
| A                            | B  | C           | D                     | E                            | F = D x E              | G                  | H = F x G                     | I                                   | J                            | K = I x J              | L                  | M = K x L                     | N = H + M                 | O                          | P = N x O                |
| State SNAP Agencies          | Request for Volunteers - Preparation and Submission of Application | N/A         | 53                    | 1                            | 53                     | 20.00              | 1,060                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 1,060                     | \$16.15                    | \$17,119.00              |
|                              | Request for Volunteers - Stakeholder Coordination                  | N/A         | 53                    | 1                            | 53                     | 80.00              | 4,240                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 4,240                     | \$16.15                    | \$68,476.00              |
|                              | Mobile Payment Pilot – Design & System Changes                     | N/A         | 5                     | 12                           | 60                     | 80.00              | 4,800                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 4,800                     | \$16.15                    | \$77,520.00              |
|                              | Mobile Payment Pilot – System Testing                              | N/A         | 5                     | 12                           | 60                     | 80.00              | 4,800                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 4,800                     | \$16.15                    | \$77,520.00              |
|                              | Mobile Payment Pilot – Issue Recruitment Notices                   | N/A         | 5                     | 5,000                        | 25,000                 | 0.08               | 2,075                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 2,075                     | \$16.15                    | \$33,511.25              |
|                              | Mobile Payment Pilot – Implementation & Support                    | N/A         | 5                     | 12                           | 60                     | 120.00             | 7,200                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 7,200                     | \$16.15                    | \$116,280.00             |
|                              | Mobile Payment Pilot – Stakeholder Coordination                    | N/A         | 5                     | 12                           | 60                     | 80.00              | 4,800                         | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 4,800.00                  | \$16.15                    | \$77,520.00              |
| <b>State Agency Subtotal</b> |  |             | <b>53</b>             | <b>478.23</b>                | <b>25,346</b>          | <b>1.14</b>        | <b>28,975.00</b>              | <b>0.00</b>                         | <b>0.00</b>                  | <b>0.00</b>            | <b>0.00</b>        | <b>0.00</b>                   | <b>28,975.00</b>          | <b>16.15</b>               | <b>\$467,946.25</b>      |
| EBT Processors               | Request for Volunteers - Coordination                              | N/A         | 53                    | 1                            | 53                     | 80.00              | 4,240.00                      | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 4,240.00                  | \$77.37                    | \$328,048.80             |
|                              | Mobile Payment   | N/A         | 5                     | 12                           | 60                     | 120.00             | 7,200.00                      | 0.00                                | 0.00                         | 0.00                   | 0.00               | 0.00                          | 7,200.00                  | \$77.37                    | \$557,064.00             |



|                                      |  |        |               |             |               |             |                  |                  |             |                  |               |               |                  |                |                       |
|--------------------------------------|--|--------|---------------|-------------|---------------|-------------|------------------|------------------|-------------|------------------|---------------|---------------|------------------|----------------|-----------------------|
|                                      | Pilot - Coordination                             |        |               |             |               |             |                  |                  |             |                  |               |               |                  |                |                       |
| SNAP Retailers                       | Request for Volunteers - Coordination            | N/A    | 106           | 1           | 106           | 80.00       | 8,480.00         | 0.00             | 0.00        | 0.00             | 0.00          | 0.00          | 8,480.00         | \$77.37        | \$656,097.60          |
|                                      | Mobile Payment Pilot - Coordination              | N/A    | 10            | 12          | 120           | 120.00      | 14,400.00        | 0.00             | 0.00        | 0.00             | 0.00          | 0.00          | 14,400.00        | \$77.37        | \$1,114,128.00        |
| Mobile Payment Vendor                | Request for Volunteers - Coordination            | N/A    | 53            | 1           | 53            | 80.00       | 4,240.00         | 0.00             | 0.00        | 0.00             | 0.00          | 0.00          | 4,240.00         | \$77.37        | \$328,048.80          |
|                                      | Mobile Payment Pilot - Coordination              | N/A    | 5             | 12          | 60            | 120.00      | 7,200.00         | 0.00             | 0.00        | 0.00             | 0.00          | 0.00          | 7,200.00         | \$77.37        | \$557,064.00          |
| <b>Business Subtotal</b>             |  |        | <b>212</b>    | <b>2.13</b> | <b>452</b>    | <b>101</b>  | <b>45,760</b>    | <b>0.00</b>      | <b>0.00</b> | <b>0.00</b>      | <b>0.00</b>   | <b>0.00</b>   | <b>45,760.00</b> | <b>\$77.37</b> | <b>3,540,451</b>      |
| SNAP Recipients                      | Mobile Payment Pilot – Review Recruitment Notice | 25,000 | 15,000        | 1           | 15,000        | 0.05        | 750.00           | 10,000.00        | 1.00        | 10,000.00        | 0.0167        | 167.00        | 917.00           | \$7.25         | \$6,648.25            |
|                                      | Mobile Payment Pilot – Complete Enrollment       | N/A    | 5,000         | 1           | 5,000         | 0.25        | 1,250.00         | 0.00             | 0.00        | 0.00             | 0.00          | 0.00          | 1,250.00         | \$7.25         | \$9,062.50            |
| <b>Individual/Household Subtotal</b> |  |        | <b>15,000</b> | <b>1.33</b> | <b>20,000</b> | <b>0.10</b> | <b>2,000.00</b>  | <b>10,000.00</b> | <b>1.00</b> | <b>10,000.00</b> | <b>0.0167</b> | <b>167.00</b> | <b>2,167.00</b>  | <b>\$7.25</b>  | <b>\$15,710.75</b>    |
| <b>Totals</b>                        |  |        | <b>15,265</b> | <b>3.00</b> | <b>45,798</b> | <b>1.68</b> | <b>76,735.00</b> | <b>10,000.00</b> | <b>1.00</b> | <b>10,000.00</b> | <b>0.0167</b> | <b>167.00</b> | <b>76,902.00</b> | <b>\$52.33</b> | <b>\$4,024,108.20</b> |

**Recordkeeping Burden:**

There is no recordkeeping or third party reporting burden associated with this information collection.

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

The annual estimated cost to respondents is \$4,024,108.20 including fully loaded wages. This estimate of respondent cost is based on the burden estimates and utilizes wage data from both the May 2021 Occupational Employment Statistics published by the U.S. Department of Labor, Bureau of Labor Statistics ([Occupational Employment Statistics| bls.gov](https://www.bls.gov)), and current Federal minimum wage rate data as reported by the U.S. Department of Labor ([Minimum Wage | U.S. Department of Labor | dol.gov](https://www.dol.gov)). To estimate the respondent cost for the State agencies, FNS used the mean hourly wage rate of \$24.28 for [Community and Social Service Specialists](#). FNS then multiplied \$24.28 by .33 to account for fully loaded wages, which equals \$32.29. Finally, because FNS reimburses State agencies for 50 percent of SNAP administrative costs, FNS divided \$32.29 by 0.5 for an adjusted annual hourly cost of \$16.15. To estimate the hourly cost for the private-for-profit business (EBT Processors, Retailers, and Mobile Payment Vendors) as described in Section A2, FNS used the mean wage rate of \$58.17 for [Software Developers](#). When fully loaded, the mean wage rate for software developers is \$77.37. FNS used the current Federal minimum wage rate of \$7.25 per hour to calculate the hourly costs for individuals/household SNAP recipients. Individual/household wages are not fully loaded. See table in A12A for details.

**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.**

While FNS recognizes there may be capital/start-up and/or ongoing operation/maintenance costs associated with this information collection, it would be difficult to estimate these costs without knowing the exact nature and scope of each pilot project and the technologies required to implement them.

**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 total annual cost to the Federal government is \$474,906.14 including fringe benefits. It is estimated that Federal employees receiving an average General Schedule (GS) grade 12 step 05 wage for the Washington DC area 2022 OMB Salary Table (\$48.78/hour), take approximately 80 hours to analyze data and a GS grade 14 step 04 (\$66.53/hour, ), take approximately 20 hours to approve and review data received from this information collection:

|                           |                             |
|---------------------------|-----------------------------|
| Program Analyst Staff:    | $80 * \$48.78 = \$3,902.40$ |
| Branch Chief Staff:       | $20 * 66.53 = \$1,330.60$   |
| Total Federal Staff Cost: | \$5,233                     |

An additional 33% of the estimated base annual staff cost to the Federal government must be added to represent fully loaded wages, equaling \$6,959.89. When added to the Federal share of State costs for the pilot (\$467,946.25), the total Federal cost is \$474,906.14.

Table 2: Federal Cost

|                                   |              |
|-----------------------------------|--------------|
| Federal Staff Cost (Fully Loaded) | \$6,959.89   |
| Federal Share State Costs         | \$467,946.25 |
| <hr/>                             |              |
| Total Federal Cost:               | \$474,906.14 |

\*Hourly rate is the average hourly rate of the program analyst and branch chief

**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 submission is a new information collection request as a result of a pilot program and will add 25,265 respondents, 55,798 responses, and 76,902 hours of burden to OMB’s inventory.

**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."**

There are no exceptions to the certification statement.