

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0446:**

**Federal Collection Methods for Supplemental Nutrition Assistance Program Recipient  
Claims**

Evan Sieradzki

Program Analyst

Food and Nutrition Service, USDA

Program Accountability and Administration Division

Supplemental Nutrition Assistance Program (SNAP)

1320 Braddock Place

Alexandria, VA 22314

703-605-3212

[evan.sieradzki@usda.gov](mailto:evan.sieradzki@usda.gov)

**Table of Contents**

**A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3**  
**A2. PURPOSE AND USE OF THE INFORMATION.....3**  
**A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....4**  
**A4. EFFORTS TO IDENTIFY DUPLICATION.....5**  
**A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....6**  
**A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....6**  
**A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....6**  
**A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....7**  
**A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....8**  
**A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....8**  
**A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....9**  
**A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....9**  
**A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....14**  
**A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....14**  
**A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....16**  
**A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....16**  
**A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....16**  
**A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....17**

**Appendices**

- Appendix A: Legal Authority
- Appendix B: Claims against households screenshot
- Appendix C: Burden Table
- Appendix D.1: Public Comment – Anonymous
- Appendix D.2: Public Comment – Charlotte McGill
- Appendix E: FPRS Homepage Screenshot for FNS 209
- Appendix F: SORN Claims Against Food Stamp Recipients USDA FNS 3
- Appendix G: Certification Memo to States
- Appendix H: TOP Handbook

**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 statement supports the request for a revision of a currently approved information collection related to collection methods for Supplemental Nutrition Assistance Program (SNAP) delinquent recipient claims. Section 13(b) of the Food and Nutrition Act of 2008 (The Act) and Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.18 require State agencies to refer delinquent debtors for SNAP benefit over-issuance to another Federal government entity as third-party disclosure reporting to U.S. Department of the Treasury for collection. The Debt Collection Improvement Act of 1996, 31 U.S.C. 3711 requires these debts to be referred to Treasury for collection when they are 180 days or more delinquent. Through the Treasury Offset Program (TOP), 31 CFR Part 285, payments such as Federal income tax refunds, Federal salaries and other Federal payments payable to these delinquent debtors will be offset and the amount applied to the delinquent debt. TOP places a reporting burden on State agencies report and disclose information on Individuals/Households and Individuals/Households (former SNAP recipients) who owe delinquent debts must be notified of the debt payment.

**A2. Purpose and Use of the Information.**

**Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.**

This information will be used by:

- Individuals or households to obtain due process before debts are referred to TOP for offset. These individuals/household SNAP recipients will receive and read the demand letters sent to their addresses by State SNAP agencies.
- State agencies to provide due process to individuals/households; to report and maintain debts in TOP systems; to request addresses; and, to certify to Treasury the accuracy and legality of debts that are submitted to TOP.
- FNS will forward the State agency files to Treasury for action and to provide Federal-level due process, as appropriate.

SNAP regulations at 7 CFR 273.18 require that State agencies establish, collect and efficiently manage SNAP recipient claims. Paragraph 7 CFR 273.18(n)(1) requires State agencies to submit debts for TOP when they are 180 days delinquent. The State agencies submit files containing these delinquent debts to FNS each week. FNS then combines the State files into one file that is sent to Treasury each week.

The burdens associated with establishing claims (demand letters which are sent to Individuals/Households (home addresses) and for reporting activity with the FNS-209 are already approved under OMB burden numbers 0584-0492, expiration date 07/31/2024 and 0584-0594 (Appendix E), expiration date 07/31/2023, respectively; and therefore, not duplicated in this request.

### **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 required to comply with the E-Government Act of 2002. State agencies have the authority to use information technology that best suits the needs of their individual and possibly unique systems of operations to comply with this information collection. Virtually every State agency employs an automated system to maintain recipient claims activity and the referral and maintenance of debts subject to TOP.

Automated data processing is used extensively for the collection methods. Electronic data transmission via desktop between State agency systems and Federal Treasury system and from mainframe is used to minimize State agency and Federal resources needed for TOP collection methods. However, currently, there is no FNS electronic system, website or database used to collect or report this information; therefore, none of these responses are reported electronically to FNS. States report aggregate referral data to TOP via the FNS 209, however that reporting is covered under the FPRS information collection (OMB Control Number 0584-0594; expiration date 7/31/2023). Additionally, States sent 60-day notices to Individuals/Households home addresses.

#### **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 are no similar data collection efforts available. FNS solely monitors Federal Collection Methods for Supplemental Nutrition Assistance Program Recipient Claims for SNAP benefits to ensure and protect program integrity. The information required for 7 CFR 273.18, 7 CFR 273.18(n) and FNS-209 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. States report aggregate referral data to TOP via the FNS 209, however that reporting is covered under the FPRS information collection (OMB Control Number 0584-0594; expiration date 7/31/2023).

**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 mandatory information collected is limited to data necessary to comply with statutory requirements and to protect Program integrity. This information collection does not affect small businesses or other small entities.

**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 mandatory and an ongoing information collection. Information for TOP associated with due process is collected once per delinquent debt when it is determined that the debt is to be referred to TOP. If information were collected less frequently, compliance with the DCIA would not be possible and FNS could not ensure program integrity and Individuals/Households would not have due process or be notified of delinquent debt and the Departmental participation in TOP would be jeopardized.

Additionally, Treasury requires that debts be maintained while in TOP. If debts are not maintained, the Federal could lose out on offsets or debtors could be over collected.

#### **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;**

There are weekly reporting requirements State Agencies are required to adhere to by Treasury for debts in TOP.

- **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 that require information collection 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.**

The 60-day Federal Register Notice was published on November 26, 2021 (86 FR 67430).

Comments were solicited on this information collection as part of the comment period of the notice. Two comments (included with this request in Appendix D.1 and D.2) were received.

However, the comments were not directly related to this proposed information collection request.

Consultation with State agencies regarding the Federal collection of SNAP claims is a continuous process. For this specific Information Collection Renewal, FNS contacted one State agency official that works closely with the TOP to collect delinquent SNAP claims in each of the following States: Missouri Department of Social Services (Dana Carrington, Dana.Carrington@dss.mo.gov), Nebraska Department of Health and Human Services (Cari Crosby, Cari.Crosby@nebraska.gov), South Dakota Department of Social Services (Brandin Seibel, Program Administrator, Brandin.Seibel@state.sd.us). These State agency contacts were sent the Federal Register Notice and asked to share any feedback on the information collected related to TOP to include their views on the frequency of collection, the clarity of instructions and recordkeeping, disclosure, and on the data elements to be recorded, disclosed, or reported. They have not submitted any feedback on the information collection as of February 10, 2022.



**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 Act and implementing 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 SNAP. Additionally, the safeguard provision in IRS Publication 1075 and the Privacy Act of 1974 apply to information used in the TOP process. The information you provide will be kept private, and will not be disclosed to anyone but the program analyst conducting this investigation, except as otherwise required by law. This information collection request was cleared by FNS Privacy Officer Michael Bjorkman on June 21, 2022.

The notice of delinquency contains personal identifiable information<sup>1</sup>. Therefore, the Food and Nutrition Service published a Privacy Act system of records notice (SORN) entitled Claims Against Food Stamp Recipients—USDA/FNS-3. A revised SORN was published on March 30, 2004, in the Federal Register Volume 69 page 16513 to specify the uses to be made of the information in this collection (Appendix F). The Privacy Act Statement will be displayed on any FNS or State designed forms or templates for the respondents review. The personally identifiable

---

<sup>1</sup> FNS' template for State agencies to use for TOP notices includes the debtor's name, address and SNAP case number.

information that appears in the notice of delinquency is collected by State agency forms that include these requirements. These forms are included under OMB burden number 0584-0064, expiration date 02/29/2024.

**A11. Justification for any questions of a sensitive nature.**

**Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information collection does disclose sensitive nature to a third party such as the program analyst conducting this investigation, except as otherwise required by law. State agencies refer delinquent debtors for SNAP benefit over-issuance to another Federal government entity as third-party disclosure reporting to U.S. Department of the Treasury for collection. The Debt Collection Improvement Act of 1996, 31 U.S.C. 3711 requires these debts to be referred to Treasury for collection when they are 180 days or more delinquent. Through the Treasury Offset Program (TOP), 31 CFR Part 285, payments such as Federal income tax refunds, Federal salaries and other Federal payments payable to these delinquent debtors will be offset and the amount applied to the delinquent debt.

The personally identifying information that appears in the notice of delinquency is collected by State agency forms that include these requirements. These forms are included under OMB burden number 0584-0064, expiration date 02/29/2024.

**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.**

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

We are basing our estimate on an average of the number of records for claims the States sent as third party disclosure to TOP for calendar years 2018, 2019, and 2020. The total burden for this collection is 48,788.64 (SA Reporting 9,332.39 + SA Recordkeeping 689 + Individual/Households 26,392.43 + third party reporting 12,374.82 = 48,788.64) (The total number of affected public is 272,214 (Individual/Households 272,161+ State Agency 53). In many instances, each of the 272,161 individuals/households may be contacted more than 1 time; however, these unique number of respondents are only counted once in the total number of respondents. The total burden for each group and their activities are broken down below.

Based on an average of the number of records for claims the States sent to TOP for calendar years 2018, 2019, and 2020, we estimate that State agencies will produce and send, and that households will read, 249,953 TOP 60-day notices. We estimate that the households will submit and State agencies will respond to about 17,497 phone and informal inquiries. Households will file and the States will respond to an estimated 1,499 appeals. An additional 2,458 notices will be sent directly from FNS to Federal employees concerning the potential offset of their Federal salary. Historically, 30 percent of these notices, 738, will result in a phone inquiry from a household, and approximately 16 notices will result in a formal appeal to FNS requiring

documentation from the State. Thus, the total number of responses for the 60-day notice and household inquiry is 547,650 responses (272,161 household responses + 275,489 State Agency responses) per year resulting in an annual reporting burden of 48,099.64 hours. The existing burden for activity relating to the 60-day notice is 56,653 hours. The net decrease of -8,553.36 hours is due to a decrease in the average number of 60-day notices sent to debtors by State agencies between 2018 and 2020.

Treasury prescribes specific processes and file formats for FNS to use to send debts to TOP. FNS provides guidance and file formats (Appendix H) to State agencies and monitors their compliance with such. State agencies must submit an annual letter to FNS (Appendix G) certifying that all of the debts submitted in the past and all debts to be submitted in the upcoming calendar year by the State agency to TOP are valid and legally enforceable in the amount stated. FNS estimates that it will take State agencies a total of 26.5 hours per year for these State submissions. This burden has not changed with this revision. The burden requirements associated with establishing claims (demand letters) and for reporting activity with the FNS-209 (648 burden hours and 212 total annual responses) are already approved under the information collections for SNAP Repayment Demand and Program Disqualification (OMB burden numbers 0584-0492, expiration date 07/31/2024; and 0584-0594, expiration date 07/31/ 2023, respectively) and therefore, not duplicated.

The burden for ADP includes weekly file processing, monthly address requests and system maintenance. Weekly and monthly file processing includes requesting addresses to use to send out 60-day notices, adding and maintaining debts in TOP, correcting errors on records that were

unable to be processed, and posting weekly collection files. Much of this activity is completed using automation and involves an estimated 1.4 million records annually. FNS estimates that this activity takes 12,374.82 annual reporting hours. Per 7 CFR 272.1(f), State agencies are required to retain all records associated with the administration of SNAP for no less than 3 years. The burden for the retention of weekly TOP files is estimated to take each of the 53 State agencies approximately 15 minutes per week, or 689 recordkeeping burden hours. These burden estimates have not changed with this revision.

The burden breakdown can be found in the table below:

SECTION OF REG	DESCRIPTION	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	hourly cost to respondent	estimated cost to respondent	with fully loaded wage
<b>Households (Debtors)</b>									
<b>A. Due-Process Notice Requirements</b>									
273.18(n)(2)	Reading State Issued Notice	249,953	1.00	249,953	0.0835	20,871.10	\$ 7.25	\$ 151,315.50	
	Informal Inquiries to State	17,497	1.00	17,497	0.25	4,374.19	\$ 7.25	\$ 31,712.87	
	Formal Appeals to State	1,499	1.00	1,499	0.50	749.29	\$ 7.25	\$ 5,432.34	
	Reading FNS issued letter to Federal employees	2,458	1.00	2,458	0.0835	205.28	\$ 7.25	\$ 1,488.25	
	Phone Inquiries and informal appeals for FNS letter	738	1.00	738	0.25	184.38	\$ 7.25	\$ 1,336.75	
	Formal appeals to FNS	16	1.00	16	0.5	8.19	\$ 7.25	\$ 59.41	
<b>Totals</b>		<b>272,161</b>	<b>1.00</b>	<b>272,161</b>	<b>0.096974</b>	<b>26,392.43</b>	<b>\$ 7.25</b>	<b>\$ 191,345.12</b>	<b>\$ 254,489.01</b>
<b>State Agencies</b>									
<b>A. Due-Process Notice Requirements</b>									
273.18(n)(2)	State Notice Production	53	4,716.10	249,953	0.0167	4,174.22	\$ 11.40	\$ 47,586.12	
	Responding to State Phone/informal Inquires	53	330.13	17,497	0.25	4,374.19	\$ 11.40	\$ 49,865.75	
	Responding to State Formal Appeals	53	28.28	1,499	0.50	749.29	\$ 11.40	\$ 8,541.89	
	Providing documents for formal appeals to FNS	53	0.31	16	0.50	8.19	\$ 11.40	\$ 93.42	
<b>B. State Agency Reporting</b>									
273.18(n)(1)(ii)	Certification Letter	53	1.00	53	0.50	26.50	\$ 11.40	\$ 302.10	
<b>State Agency Total</b>		<b>53</b>	<b>5,075.81</b>	<b>269,018</b>	<b>0.03</b>	<b>9,332.39</b>	<b>\$ 11.40</b>	<b>\$ 106,389.27</b>	<b>\$ 141,497.73</b>

<b>C. TOP Automated Data Processing/3rd Party Reporting</b>										
273.18(n)(1)	System Compatibility File	53	1.00	53	11.50	609.50	\$ 11.40	\$ 6,948.30		
	Address File	53	8.00	424	1.6346	693.07	\$ 11.40	\$ 7,901.00		
273.18(n)(4)	Collections File	53	8.00	424	6.50	2,756.00	\$ 11.40	\$ 31,418.40		
	State Agency Profile	53	1.00	53	0.25	13.25	\$ 11.40	\$ 151.05		
	Testing New System	5	1.00	5	7.00	35.00	\$ 11.40	\$ 399.00		
	Weekly Files	53	52.00	2,756	1.50	4,134.00	\$ 11.40	\$ 47,127.60		
	Weekly Files - Post TOP Data	53	52.00	2,756	1.50	4,134.00	\$ 11.40	\$ 47,127.60		
<b>272.1(c)</b>	<b>Total 3<sup>rd</sup> Party reporting</b>					<b>12,374.82</b>	<b>\$ 11.40</b>	<b>\$ 141,072.95</b>	\$ 187,627.03	
<b>Totals</b>		<b>53</b>	<b>5,197.91</b>	<b>275,489</b>	<b>0.08</b>	<b>21,707.21</b>	<b>\$ 11.40</b>	<b>\$ 247,462.23</b>	<b>\$ 329,124.76</b>	
<b>Overall Totals</b>		<b>272,214</b>	<b>2.01</b>	<b>547,650</b>	<b>0.09</b>	<b>48,099.64</b>		<b>\$ 438,807.35</b>	<b>\$ 583,613.77</b>	

	RECORDKEEPING							
Regulatory Citation	NO. OF RECORD-KEEPERS	ANNUAL RECORDS PER	TOTAL RECORDS PER	HOURS PER RECORD	TOTAL RECORD - KEEPING	Hourly cost	total	Total with fully loaded wages
272.1(f)	53	52	2,756	0.25	689.00	11.40	\$7,584.60	\$10,446.62

The annual cost burden to both affected publics is \$594,060.39 (\$141,497.73 State agencies includes fringe benefits, reporting + \$10,446.62 recordkeeping cost + \$254,489.01 individuals/households annual base cost includes fringe benefits + \$187,627.03 third party reporting).

SNAP information collection requirements described herein are imposed primarily on State agency eligibility workers. Standard wage rate categories used in determining annualized burden costs are based on the Bureau of Labor and Statistics (BLS) May 2021 Occupational Employment and Wages Statistics report which indicated a median wage rate of \$22.80 per hour for eligibility interviewers in government programs. States would incur an annualized administrative cost of \$22.80 per hour burden in the information collection. FNS reimbursed 50 percent of the administrative costs to the State agencies. This results in a reimbursement value of \$11.40 per burden hours which we use to assess the total cost to respondents. These costs include fully loaded wages which are 33% of total costs to include fringe benefits.

The Federal minimum wage rate of \$7.25 per hour is used to calculate annualized costs for Individuals/households applying for SNAP benefits. There are no reimbursable costs to SNAP participants.

**A13. Estimates of other total annual cost burden.**

**Provide estimates of the total annual cost burden to respondents or recordkeepers resulting**



**from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital, start-up and/or annualized maintenance costs associated with this burden.

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

**Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

FNS reimbursed 50 percent of the administrative costs to the State agencies, this cost is include in the cost to the Federal government. The annual cost to the Federal Government to collect and use the data for TOP is estimated at a total annual cost to the Federal Government with fully-loaded wages is **\$839,571.38** is (\$500,000 contract cost +\$339,571.38 annual base Federal cost including fringe benefits).

This total includes an estimated **\$500,000** (already includes fringe benefits) for contracted computer services, which would not have been incurred without this collection, and an additional \$141,497.73 for the Federal share reimbursed to State agencies' (SAs) burden for reporting, \$187,627.03 for third party reporting and \$10,446.62 for recordkeeping. The Federal share reimbursement to State agencies with fringe benefits is \$339,571.38.

SNAP information collection requirements described herein are imposed primarily on State agency eligibility workers. Standard wage rate categories used in determining annualized burden costs are based on the Bureau of Labor and Statistics (BLS) May 2021 Occupational Employment and Wages Statistics report which indicated a median wage rate of \$22.80 per hour for eligibility interviewers in government programs. States would incur an annualized

administrative cost of \$22.80 per hour burden in the information collection. FNS reimbursed 50 percent of the administrative costs to the State agencies. This results in a reimbursement value of \$11.40 per burden hours which we use to assess the total cost to respondents.

In total, the combined estimated total annualized cost to the Federal Government is \$344,150.84 with fully loaded wages included. This cost includes:

	Hours	Hourly Wage*	Total
GS-13 Program Analyst Step 1	20	\$51.18	\$1,023.60
GS-14 Branch Chief Step 1	40	\$60.49	\$2,419.60

**Cost of Federal workers:**

**\$3,443.20**

**With Fringe Benefits:**

**\$4,579.46**

\*Wage rates determined in accordance with the Office of Personnel Management's salary table for 2022

([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/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 information collection. The current reporting burden inventory for this data collection is an overall **56,653 reporting and recordkeeping burden hours and 666,864 total annual responses for reporting and recordkeeping.** We are requesting **48,789 reporting and recordkeeping burden hours (48,099.64 reporting + 689**

**recordkeeping hours**), a decrease of **-7,864 reporting hours, the recordkeeping hours remains unchanged from the currently approved request**. The current overall total annual response is **666,864, we are requesting 550,406** a decrease of **-116,458**, this too is reflective of solely the reporting burden estimates. The currently approved respondents for individuals/households is 305,020 which has been decreased to 272,161, and 53 State agencies, which remains the same. These adjustments are due to a decrease in the average number of 60-day notices sent to debtors by State agencies between 2018 and 2020.

FNS is also reporting 12,374.82 burden hours for third party reporting associated with sending data to TOP for only the State agencies (this burden is included above in the overall 48,099.64 reporting burden hours above for Individuals/Households and State agencies). This was not broken out in the last collection or the 60dayFRN, the third party reporting is now broken-out is in supporting statement 12.

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

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

There is no plan to publish data.

**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 are no forms associated with this information collection. While the content of the notice is mandated by Treasury, it does not mandate a specific format. The address requests and weekly files are submitted via electronic data transmission as required by Treasury. The Agency does

display the expiration date for OMB approval of the information collection for all the instruments it does use.

**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."**

This information collection conforms to the requirements of 5 CFR 1320.9. There are no exceptions to the certification statement.