

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. The Consolidated Appropriations Act, 2023 (PL-117-328) authorized USDA to approve a state agency plan for the covered summer period alone, without the need for an approved plan for the preceeding school year, limited summer P-EBT eligibility to children who attended NSLP-participating schools at the end of the preceeding school year, and redefined the P-EBT summer benefit amount for 2023. 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 OMB control number 0584-0660, Pandemic EBT (P-EBT), which expires November 30, 2023.

Due to the expiration of the COVID-19 Public Health Emergency on May 11, 2023, which in turn deemed FY 2023 the last year that States could receive approval for P-EBT implementation, this revision of the currently approved information collection pertains only to limited elements of the collection to facilitate the orderly wind-down and close-out of the P-EBT program.

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 temporarily lost access to free or reduced-price school meals due to pandemic related school closures, reduced school hours, or reduced school attendance prior to or on May 11, 2023 (the last day of the COVID-19 Public Health Emergency). These households were 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 per day will be no less than the value of school meals at the free rate 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 and/or excused absences due to COVID-19 related concerns. 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 enrolled in a National School Lunch Program participating school as of the last month of the school year, and considered eligible to receive free/reduced price meals during the preceeding school year or were newly determined eligible during the covered summer months. 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 or Summer 2022. Because the COVID-19 Public Health Emergency ended prior to Summer 2023, children in child care were not eligible to receive the summer component in Summer 2023.

USDA expected 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 were potentially eligible for P-EBT benefits through use of an application process. Based on information provided by States via their approved operational plan, FNS expects that there will only be one State (Kansas) with school districts that will need to identify eligible school children via an application process after November 30, 2023; all other States and territories will have concluded this activity prior to that date.

In addition to issuing P-EBT benefits to eligible children, each State SNAP agency will also be required to provide monthly reports via the FNS-292B (*Disaster Relief*) (Attachment C) 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 D) and FNS-46 (*Issuance Reconciliation Report*) (Attachment E) 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 will provide funding to each State for 100% of P-EBT-related administrative costs. Such

funding will be available for the necessary, allowable, and reasonable State agency costs associated with the administration of P-EBT, including activities related to orderly wind-down and conclusion of the program, incurred during FY 2024. This includes administrative costs associated with the issuance of retroactive benefits from previous Fiscal Years incurred in FY 2024. 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 F).

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 9/30/26). 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 and SF-425 for normal Program operations.

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 that all data was submitted 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. As noted above, we expect that majority of this work will be completed by States and territories prior to November 30, 2023.

For the one remaining State, Kansas, with school districts that will need to collect P-EBT applications from households after November 30, 2023, only the households that are not already in the State's SNAP eligibility system will be required to complete that application in order to receive benefits. The application does not determine eligibility, but only collects information needed to issue benefits, such as child's name and mailing address.

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 85.16% are small entities (the 287 school districts in one State). State agencies administer SNAP at the State level and

collect the necessary data to ensure correct eligibility determinations and delivery of benefit. Of the 50 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.” 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.

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.**

Because Kansas is the only State with school districts that will need to identify eligible school children via an application process after November 30, 2023, respondents will need to prepare a written response to a collection of information in fewer than 30 days after the receipt of it (Kansas will make applications available from households from February 1, 2024 through February 29, 2024). Kansas is also one of the 50 states that will be reporting data on a monthly basis to FNS via the FNS 292-B.

Otherwise, 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 September 28, 2023 (Volume 88, Number 187, pages 66796-66797). The comment period for the information collection ended on November 27, 2023. FNS received two comments in response to the agency's notice. Both comments were non-substantive and not relevant in nature.

FNS reached out to staff from several State agencies to specifically request their feedback on the appropriateness of the identified burden load.

Contacts included:

- Claire Graves, Chief Innovation Officer, Mississippi Department of Human Services, Claire.Graves@mdhs.gov
- Kieyana Carter, Program Director, EBT/P-EBT/D-SNAP, Tennessee Department of Human Services, Kieyana.Carter@tn.gov
- Pamela Mack, Food and Nutrition Director, Georgia Department of Human Services Pamela.Mack@dhs.ga.gov
- Sara van Straaten, Food Assistance Program Specialist, Kansas Department for Children and Families Sarah.vanStraaten@ks.gov

These contacts indicated the estimates in the information collection accurately reflected burden hours to administer and implement P-EBT.

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.

For the remaining State that will be issuing the majority of their benefits after November 30,

2023, FNS expects that the children who are known to the State’s SNAP agency will receive benefits automatically. Households of children who are not known to the State’s SNAP agency will need to fill out a P-EBT application to provide contact information in order to receive benefits. Based on the State’s approved plan, FNS expects a maximum of 114,000 children to receive P-EBT benefits, and so has estimated 114,000 respondents in the burden table.

FNS expects all 287 school districts in the State will provide data for the administration of pandemic EBT.

FNS expects 50 State agencies and territories will choose to operate the P-EBT program in some capacity in FY 24 as part of program wind down and close out, and all 50 State agencies and territories have opted 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 20,087. The total requested number of annual responses is 115,374. See table below for calculations.

Respondent Category	Instrument s	Form	Number of respondent s	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	114,000	1	114,000	0.166666667	19,000	96,833

Schools	Student Eligibility Data (School Year)	N/A	0	0	0	0	0	568,602
	Student Eligibility Data (Summer)	N/A	287	1	287	0.5	144	47,384
	P-EBT Local Level Administrative Cost Reporting to State	N/A	287	1	287	0.5	144	94,767
Schools Subtotal			287	2	574	1	287	710,753
State Agencies	State Plan Submission - P-EBT (school year 2020-2021)	N/A	0	0	0	0	0	53
	State Plan Submission - P-EBT (Summer)	N/A	0	0	0	0	0	53
	P-EBT Household Eligibility Determination	N/A	0	0	0	0	0	2,165,000
	Monthly P-EBT Reporting to FNS	FNS-292B	50	12	636	1	600	600.00
	P-EBT Administrative Cost Plan (100% funding)	FNS-366A	0	0	0	0	0	636
	P-EBT Quarterly Administrative Cost Report (100% funding)	SF-425	50	4	200	1	200	212
	P-EBT Reporting to FNS (Summer)	N/A	0	0	0	0	0	27

SA Subtotal			50	16	800	1	800	2,166,617
Grand Total			114,337	1.009	115,374	0.174	20,087	2,974,203

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 2022, 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 \$38.13 per hour. When this wage is fully loaded (wage + wage*.33) States would incur an annualized administrative cost of \$50.71 per hour burden in the information collection. \$50.71 x 800 burden hours equals \$40,570.32 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 2022 National Occupational Employment and Wage Statistics, Occupational Group (25-0000)². The hourly mean wage (for education-related occupations) for functions performed by State agency and LEA staff are estimated at \$30.41 per staff hour. When this wage is fully loaded (wage + wage*.33) Schools would incur an annualized administrative cost of \$40.45 per hour burden in the information collection. \$40.45 x 287 burden hours equals \$11,607.08 cost to respondents. However, all participating State agencies and schools elected to receive 100% funding by the Federal government, which will result in \$0 cost.

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

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

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 * 19,000 burden hours equals \$ 137,750 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	\$137,750
Total	\$137,750

*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.

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 50 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

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

SNAP applicants are not reimbursed. A detailed calculation is included in the Burden Table (Appendix A).

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, due to the end of the COVID-19 Public Health Emergency on May 11, 2023. All States and territories with approved plans, except for Kansas, required households to complete and submit P-EBT applications by or before November 30, 2023; therefore, the 114,000 respondents reported in the burden table represents the maximum number of families in Kansas that would potentially complete this application. The previously approved burden for households completing applications was 96,833 hours; it is estimated that the burden for the remaining State will be 19,000 hours, a reduction of 77,833 hours due to program change (i.e., end of the P-EBT program).

This revision greatly reduces burden for States agencies. Due to the end of the COVID-19 Public Health Emergency on May 11, 2023, which in turn deemed FY 2023 the last year that States could receive approval for P-EBT implementation, State agencies will no longer have to develop and submit operational plans for the school year or summer periods, conduct P-EBT household eligibility determinations, report summer benefits, nor submit the P-EBT Administrative Cost Plans. All States and territories have or will have completed these items prior to November 30, 2023. Additionally, only 44 States (all States except Alaska, Mississippi, Missouri, Montana, South Dakota, and Texas) and 6 territories (American Samoa, the Commonwealth of the

Northern Mariana Islands, the District of Columbia, Guam, Puerto Rico, and Virgin Islands could potentially issue benefits after November 30, 2023. These 50 State and territories represent all who had PEBT plans approved for School Year (SY) 22-23 or summer 2023. Previously, 53 States and territories (consisting of 49 States (all except North Dakota) and 4 territories (American Samoa, the District of Columbia, Puerto Rico, and the Virgin Islands)) had approved PEBT plans. The previously approved burden for State agencies for was 2,166,617; it is estimated that the burden for State agencies will now be 800 hours, a reduction of 2,165,817 hours due to program change.

This revision reduces burden to account for school reporting requirements. Currently, there are 710,753 hours approved for schools. Due to there only being one State that would potentially need school districts to verify student eligibility data for summer plans or incur P-EBT local administrative cost reporting to the state, the burden has been reduced to 287 hours. This is a reduction of 710,466 burden hours related to school reporting requirements. This reduction is due to program changes.

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.