



Food and Nutrition Service
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FROM: Dionne Duncan-Hughes
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Planning and Regulatory Affairs Office, Office of Policy Support
Food and Nutrition Service (FNS)

DATE: August 01, 2024

SUBJECT: Justification for Non-Material/Non-Substantive Change to OMB Control #0584-0512 regarding Supplemental Nutrition Assistance Program (SNAP) Earnings Verification Service (EVS) Support Grants

The Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) requests a non-substantive change to the Uniform Grant Application for Non-Entitlement Discretionary Grants, approved under OMB Control No. 0584-0512; expiration date of 7/31/2025.

Through this memorandum, SNAP requests approval to include the SNAP Earnings Verification Service (EVS) Support Grants in this OMB-approved information collection request (ICR) for cooperative agreement and grants. FNS has sufficient burden hours included in the ICR to cover the work for this grant. FNS set aside burden hours for miscellaneous grants in 0584-0512.

The Food and Nutrition Act of 2008 (the Act) requires that SNAP State agencies verify the income of applicants at initial certification and recertification. In recent years, many States have contracted with commercial vendors to use third-party income databases (TPIDs) that provide electronic verification of employment and earnings. Congress authorized \$38 million, via the Consolidated Appropriations Act, 2021 P.L. 116-260, in annual funding to support SNAP State agencies' use of these services. The SNAP EVS Support Grants will provide noncompetitive grant funding to SNAP State agencies to assist their use of TPID services under their own State contracts, to procure new State contracts to support electronic verification of employment and earnings, or to explore and test alternative methods to electronically verify employment and earnings.

The burden hours associated with the request for applications from grantees, are delineated below and already covered under the "miscellaneous" grants portion of the ICR for grants not identified in the existing ICR:

- a. There are burden hours associated with the State agency recipients for submission of the application to the National Office and receiving responses from State agencies. The estimate

is 2 hours for each of the fifty-three State agencies, for a total of 106 hours and 53 responses. There are 340 hours associated with the pre-award reporting forms. The total pre-award hours of 446 hours would be taken from the existing non-competitive pre-award burden hours of approximately 2045 and 53 responses would be taken from the 125 responses already set aside for miscellaneous grants not explicitly identified in 0584-0512.

- b. There are burden hours associated with State agency post-award reporting and forms. The estimate is 14 hours total for each of fifty-three State agencies to submit 6 post award report responses, for a total of 742 reporting hours and 318 responses. These 742 hours would be taken from the total post-award of 5515 hours set aside for miscellaneous non-competitive grants not explicitly identified in 0512.
- c. There are burden hours associated with recordkeeping. The estimate is 1 hour per each of the fifty-three State agency respondents, for a total of 53 hours and 318 responses (53 State agencies x 6 responses each). These 53 hours would be taken from the existing 742 burden hours and 318 responses would be taken from the 318 responses already set aside for miscellaneous grants not explicitly identified in 0584-0512.

Respondent Type	Burden Estimates	Approved under SA Miscellaneous	Currently Available SA Miscellaneous	Requested for use with this IC for SA Miscellaneous	Difference (Remaining) SA Miscellaneous
State, Local and Tribal Government	Responses	1070	1070	689	381
	Hours	5515	5515	1241	4274

If you have any questions regarding this request, please contact Dionne Duncan-Hughes, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning and Regulatory Affairs Office at (703) 305-2403.