

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0479:

Supplemental Nutrition Assistance Program: Work Requirements and Screening

Final Rule: Supplemental Nutrition Assistance Program: Work Requirement Provisions of the
Fiscal Responsibility Act of 2023 (RIN 0584-AF01)

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Appendix A: Supplemental Nutrition Assistance Program: Program Purpose and Work Requirement Provisions of the Fiscal Responsibility Act of 2023 (RIN 0584-AF01)

Appendix B: Sec. 6(d) and 6(o) of the Food and Nutrition Act of 2008

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Appendix D: Fiscal Responsibility Act of 2023

Appendix E: FNS-583 Program Activity Report

Appendix F: Burden Table

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 revision to an existing information collection based on the final rule titled, *Supplemental Nutrition Assistance Program: Program Purpose and Work Requirement Provisions of the Fiscal Responsibility Act of 2023* (0584-AF01). The final rule revises Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 271 and 273 to implement provisions of the Fiscal Responsibility Act (FRA) of 2023 (Public Law 118-5) and incorporates requirements to screen for exemptions from the general work requirements and exceptions from the able-bodied adults without dependents (ABAWD) time limit.

The Food and Nutrition Act of 2008 establishes national eligibility standards for the SNAP, including work requirements for certain individuals. SNAP has two types of work requirements: (1) the general work requirements and (2) the ABAWD work requirement and time limit.

Most SNAP participants are exempt from the general work requirements because they are elderly, disabled, children, or meet another exemption from the general work requirements listed in the Act. Individuals who are not exempt from the general work requirements may also be subject to an additional requirement of working, participating in a qualifying work program, or any combination of the two, for at least 20 hours a week (averaged monthly to 80 hours a month). Individuals subject to this requirement, referred to the ABAWD work requirement, are limited to receiving SNAP benefits for three months in a 36-month period unless they are meeting the work requirement, live in an area where the time limit is waived due to a lack of sufficient jobs, or are otherwise exempt. These individuals are referred to as ABAWDs or time-

limited participants.

The FRA added language to the general purpose of SNAP focused on supporting work and helping individuals obtain earnings. The Department proposed to update the general purpose language for SNAP to reflect these changes. There is no burden associated with this provision.

The FRA gradually increases the upper age limit of the age-based exception three times over the next year and created three new exceptions from the time limit for individuals experiencing homelessness, veterans, and individuals aging out of foster care. The FRA also provided that these changes sunset on October 1, 2030. The Department proposed to update regulations to incorporate the final age increase, add the three new exceptions and definitions for each, and codify that the changes to exceptions sunset on October 1, 2030. The burden related to these provisions is covered in this information collection (OMB Control Number: 0584-0479).

The FRA also reduced the annual allotment of discretionary exemptions from 12 percent of the ABAWD caseload to 8 percent and imposed limits on carryover of unused exemptions to only those earned in the previous fiscal year. The Department proposed to update regulations to adjust the annual allotment to 8 percent of the ABAWD caseload and limit carryover starting in FY 2026. The burden for reporting use of discretionary exemptions is covered under OMB Control Number 0584-0594 (Food Programs Reporting System (FPRS) (Form FNS-583); expiration date: 09/30/2026) (See Appendix E).

In addition to the provisions of the FRA, the Department also proposed requirements for State

agencies to screen for exemptions from the general work requirements and exceptions from the ABAWD time limit. The rule requires State agencies to screen individuals at initial application, recertification application, and when a change occurs during the certification period and prohibits State agencies from applying the time limit and assigning countable months unless they have screened the individual and determined they do not meet an exception from the time limit. Additionally, because individuals are not subject to the ABAWD time limit if they are exempt from the general work requirements, this rule also requires screening for exemptions from the general work requirements. The burden related to these provisions is covered in this information collection (OMB Control Number: 0584-0479).

Lastly, the Department also proposed State agency requirements for verifying exemption status, when questionable. The burden for verification of questionable information is covered under OMB Control Number 0584-0064 (SNAP Forms: Applications, Periodic Reporting, Notices; expiration date: 05/31/2027).

The Department received 40 comments on the proposed rule. Commenters were generally supportive, appreciating the Department's efforts to protect program access and work to ensure individuals are not improperly subjected to the time limit. Most commenters disagreed with the FRA itself, and as a result, the changes to the program purpose, age-based exception, and discretionary exemptions. These commenters argue that time limits undermine the effectiveness of SNAP and are not a viable solution to mitigate food security or bolster employment and earnings. Three others opposed the new definitions and screening provisions, arguing that these provisions are overly expansive and unnecessary to implement the provisions of the FRA. The

Department considered all comments in the final rule and determined most comments could be addressed without changes to the regulatory text. However, some commenters did provide recommendations for strengthening the rule which the Department adopted, including:

1. Amending screening provisions to use “any” exception instead of “an” exception;
2. Adding a requirement for State agencies to apply the exception that will be in effect the longest;
3. Adding a cross-reference to the new verification provision; and
4. Codify that discretionary are used in order of accrual when determining carryover.

The rest of the rule is finalized as proposed.

The new burden requirements for this rule require a revision to OMB Control Number: 0584-0479 (expiration Date 02/28/2026). The Department is also seeking a three-year renewal of OMB Control Number 0584-0479 with the Final Rule. . OMB Control Number 0584-0479 currently covers burden related to preparation and submission of ABAWD waivers. ABAWD waivers are submitted via the Waiver Information Management System (WIMS), and the burden for this submission is covered which is covered under OMB Control Number 0584-0083 (Operating Guidelines, Forms, Waivers, Program and Budget Summary Statement; expiration date: 9/30/2026). The final rule does not make changes to burden covered under OMB Control Number 0584-0083 or the existing burden covered under OMB Control Number 0584-0479. Following final rulemaking, the agency plans to publish another notice in the Federal Register announcing to the public OMB’s approval.

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.

The purpose of this information collection associated is to comply with the requirements of Section 6(d) and 6(o) of the Food and Nutrition Act of 2008 and changes to 7 CFR 273.7 and 273.24 in the final rule, *Supplemental Nutrition Assistance Program: Program Purpose and Work Requirement Provisions of the Fiscal Responsibility Act of 2023* (RIN 0584-AF01).

This is needed to ensure State agencies are properly implementing SNAP work requirements. State agencies are required to verify the number of hours worked at initial and recertification application and verify if an individual has received countable months in another State at initial application. State agencies must also provide written and oral explanation of the work requirements to all individuals subject to those requirements. Additionally, State agencies are required to issue a Notice of Adverse Action to ABAWDs (individuals/households) when they have received three countable months and will become ineligible for SNAP. The required activities necessitate the collection and dissemination of information and must occur to ensure program rules are appropriately implemented. Many of these activities are already covered in OMB Control Number 0584-0064, however, as a result of the statutory changes made by the Fiscal Responsibility Act and this final rule, the Department estimates additional burden from a net increase in the number of individuals subject to the time limit. To ensure all burden related to these activities is covered, the Department is including burden for these additional individuals and subsequent activities in this information collection.

This final rule also includes a requirement to screen SNAP applicants and recipients to determine

if they are subject to the general work requirements and/or the time limit. It further prohibits State agencies from applying the time limit and assigning countable months until they have screened individuals for the exceptions from the time limit. The collection of this information is required to ensure State agencies apply work requirements policy correctly.

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.

The Department is committed to complying with the E-Government Act of 2002, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes.

A3.2. Burden Reduction

FNS has taken efforts to reduce burden related to this information collection, however, this rulemaking would not result in an actual reduction in burden. While this rulemaking would decrease the burden related to ABAWD waiver requests, it would increase the burden on State agencies and individuals as more ABAWDs would be required to comply with the work requirements. FNS continues to provide technical assistance to State agencies around work requirements policy and strategies for reducing burden on clients and State agency staff.

In addition to ongoing technical assistance with State agencies around work requirements policy, FNS has taken the following efforts to reduce burden related to this information collection include:

1. Developing the Waiver Information Management System (WIMS) to streamline waiver requests and response process.
2. Developing waiver request templates and including plain language instructions to assist State agencies in correctly filling out the template.
3. Providing model notices to State agencies that are written in plain language, including the Notice of Adverse Action for ABAWDs, the Consolidated Work Notice, and a script for the Oral Explanation of the work requirements.
4. Encouraging State agencies to communicate the FRA changes, especially the changes to exception criteria, through trusted sources, and utilize outreach campaigns and partnerships with trusted community organizations.

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.

The burden estimates related to screening are not captured in any existing OMB Control Number. The burden estimates related to mandatory verifications and noticing requirements are covered under OMB Control Number 0584-0064. However, the Department anticipates a net increase in the number of ABAWDs and as such, is including additional burden for these individuals in this revision and renewal of 0584-0479.

Every effort has been made to avoid duplication. FNS has reviewed USDA recordkeeping requirements, state administrative agency recordkeeping requirements, and special studies by other government and private agencies. FNS solely monitors and administers the Supplemental Nutrition Assistance Program.

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.

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

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 an ongoing, mandatory data collection required by statute. The information is collected for the purpose of ensuring integrity and compliance with SNAP regulations by State agencies and applicant households. If this information is not collected or is collected less frequently, State agencies would not be in compliance, the Department would not know if State agencies are properly identifying ABAWDs, resulting in millions of dollars in SNAP benefits could be issued incorrectly and individuals being inappropriately cut off from SNAP benefits.

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.

There are no circumstances that will cause the information collection to be inconsistent with the guidelines of 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. 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.

On April 30, 2024, the Department published a 30-day Federal Register Notice, embedded within the Notice of Proposed Rulemaking (NPRM) for the proposed rule titled Supplemental Nutrition Assistance Program: Program Purpose and Work Requirement Provisions of the Fiscal Responsibility Act of 2023 (89 FR 34340), soliciting public comments on the information collection requirements associated with the adoption of the accompanying rule.

Following publication of the proposed rule, the Department received comments directly on the estimated cost and burden hours and comments related to the proposed program changes.

Twelve commenters, representing advocacy organizations, a professional association, and individuals, agreed with the Department's estimates of an increased burden and cost for State agencies and individuals resulting from the implementation of the FRA and from the inclusion of the screening for exemptions from the general work requirements and exceptions from the time limit.

Two commenters also expressed concern with the Department's assumptions of burden and cost related to verification of exception status. In the proposed rule, the Department estimated no net change in the estimated burden related to mandatory verifications and verification of questionable information captured in OMB Control Number 0584-0064.

One State agency commented that while it appreciated the streamlining goal of the new verification procedures, it was concerned it would increase burden for State agencies. One professional association commented that decreased burden resulting from the new verification procedures would not offset the increased burden of verifying questionable information. The Department disagrees with these commenters.

The rule included the new verification requirement to minimize unnecessary burden on individuals and improve efficiency in verifying exception status, especially during the certification period. State agencies are not required to verify exception status and can accept self-attestation. State agencies would only pursue verification if the information is considered questionable. Further, when setting guidelines for what information is questionable, State agencies may not discriminate or target any one group for more intensive verification, meaning

State agencies may not consider self-attestation of exception status to always be questionable. As a result, an increase in the number of time-limited participants does not necessarily mean an increase in burden and cost related to verification of questionable information. Additionally, the Department anticipates the verification provision to reduce burden on both clients and State agencies by lowering the number of actions needed to verify information and decreasing time wait for the individual to provide sources of verification and for eligibility workers to verify the information. As a result, the Department is not making any changes to the burden estimates for verification of questionable information in OMB Control Number 0584-0064.

A professional association also expressed concern that the Department did not account for an increased burden stemming from the reduction in the annual allotment of discretionary exemptions and the limitations on carryover. Many State agencies have used discretionary exemptions to extend benefits for specific populations that are now exempt from the time limit, such as individuals that are experiencing homelessness. Further, the new screening provisions prohibit State agencies from assigning countable months until they screen an individual after they lose an exception. As a result, this will reduce the need for State agencies to use discretionary exemptions cover individuals after they lose an exception during the certification period and reduce the number of actions State agencies must take on a case.

Beyond specific comments on the information collection and administrative burden, commenters provided recommendations for strengthening the rule, especially for the screening provisions. The Department is making minor changes in response to these comments, including codifying the carryover of discretionary exemptions, making minor adjustments to the language in the

screening provisions, and adding a requirement to code the exception that will last the longest. However, these changes do not necessitate changes to the burden estimates associated with the rule.

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.

When the Department revises an information collection, the information is posted on the agency web page for review and comment by FNS Regional Offices, State agencies, community groups, and the public. The Department also consults with FNS Regional Offices regarding any proposed changes as the result of legislative, regulatory, or administrative changes. FNS Regional Offices are in contact with State agencies which provide feedback on processes and procedures for the information collection.

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 payment or gift 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. No confidential information is associated with this collection of information.

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.

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.

The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond and annual hour burden are shown in the attached Burden Table (Appendix F). The Department has updated the burden and cost estimates based on more recent data on SNAP participation and labor rates. The Department did not need to make any adjustments to the burden and costs estimates as a result of comments on the proposed rule or changes in the final rule.

There are no recordkeeping or third-party public disclosure burdens for this information collection request.

The Department differentiates between start-up burden and ongoing burden estimates and provides a detailed breakdown of the start-up and ongoing burden below and in Table 1.

Start-Up Burden

The estimated total burden on State agencies for start-up costs is 469,177 hours (53 State agencies and 105,030 State agency staff x 1 response per State agency x 4.46 hours per request = 469,177 hours). This is a net increase of 469,177 hours to 0584-0479.

Update of Eligibility Systems (7 CFR 273.24(c)(7), (8), (9), and (10)): The Department estimates 53 State agencies will need to update their eligibility systems to include coding for the new exceptions and modified age-based exception and to update their notices (Consolidated Work Notice and Notice of Adverse Action for ABAWDs) to include language on the new requirements. The estimated total burden on State agencies for updating their eligibility systems is 250,637 hours (53 State agencies x 1 response per State agency x 4,729 hours per request = 250,637 hours).

Update of Policy Manuals and Documents (7 CFR 273.24(c)(7), (8), (9), and (10), 273.24(k), 273.24(l), 273.7(b)(3)): The Department estimates 53 State agencies will need to update their policy manuals, guidance, and other related materials to include the new requirements. The estimated total burden on State agencies for updating their policy documents is 4,240 hours (53 State agencies x 1 response per State agency x 80 hours per request = 4,240 hours).

Staff Training on New Requirements (7 CFR 273.24(c)(7), (8), (9), and (10), 273.24(k), 273.24(l), 273.7(b)(3)): The Department estimates 53 State agencies will need to develop and deploy training for staff on the new requirements. The estimated total burden on State agencies for staff training is 4,240 hours (53 State agencies x 1 response per State agency x 80 hours per request = 4,240 hours).

Take Training on New Requirements (7 CFR 273.24(c)(7), (8), (9), and (10), 273.24(k),

273.24(l), 273.7(b)(3)): The Department estimates 105,030 State agency staff will need to take training on the new requirements. The estimated total burden on State agencies is 210,060 hours (105,030 respondents x 1 response per respondent x 2 hours per request = 210,060 hours).

Ongoing Burden

The final rule implements changes to the exceptions from the ABAWD work requirements and time limit, which resulted in some individuals becoming newly subject to the time limit, while others are no longer subject to the time limit. The Department estimates a net increase in the number of ABAWDs, resulting in an increased burden on State agencies and individuals. These individuals would need to have their work hours verified, receive the Consolidated Work Notice, receive the oral explanation of the work requirements, and receive the Notice of Adverse Action for ABAWDs. The final rule also would also require State agencies to screen individuals for the exemptions from the general work requirements and exceptions from the ABAWD work requirement and time limit. The total ongoing burden across all new provisions is 4,032,013,61 hours (2,016,588.31 hours on State agencies and 2,015,425.31 hours on individuals). This is a net increase of 4,030,850.61 burden hours to 0584-0479.

Applying Modified Exception Criteria

The ongoing burden of the increased number of ABAWDs and resulting required actions is 304,812.23 hours (152,406.11 hours on State agencies and 152,406.11 hours on individuals).

State agencies will incur this burden until October 1, 2030, when the changes to the exception criteria sunset.

Verification of Hours Worked (7 CFR 273.2(f)(1), (f)(2), and (f)(8)(i)): The Department estimates 53 State agencies will now need to verify the number of hours worked at initial or recertification for 517,170.50 additional individuals age 50-54 who are newly subject to the time limit, based on the Department's projections of the average SNAP caseload from FY 2025 through FY 2030 and projections of the number of individuals age 50 to 54 who will be newly subject to the time limit and are not exempt. This number may include individuals who may be exempt as a veteran or individual experiencing homelessness. The estimated total burden on State agencies for this provision is 47,407 hours (53 State agencies x 9,757.93 responses per State agency x 0.092 hours per request = 47,407 hours). The estimated total burden on individuals for this provision is 47,407 hours (517,170.50 individuals x 1 response per individual x 0.092 hours per request = 47,407 hours).

Issuance and Review of Consolidated Work Notice (7 CFR 273.7(c)(1)): The Department estimates approximately 517,170.50 additional individuals across 53 State agencies are newly subject to the time limit and will now receive the Consolidated Work Notice. The estimated total burden on State agencies for this provision is 43,098 hours (53 State agencies x 9,757.93 responses per State agency x 0.083 hours per request = 43,098 hours). The estimated total burden on individuals for this provision is 43,098 hours (517,170.50 individuals x 1 response per individual x 0.083 hours per request = 43,098 hours).

Review of Oral Explanation of the Work Requirements (7 CFR 273.7(c)(1)): The Department estimates approximately 517,170.50 additional individuals across 53 State agencies are newly subject to the time limit and will now receive the oral explanation of the work requirements. The estimated total burden on State agencies for this provision is 43,098 hours (53 State agencies x 9,757.93 responses per State agency x 0.083 hours per request = 43,098 hours). The estimated total burden on individuals for this provision is 43,098 hours (517,170.50 individuals x 1 response per individual x 0.083 hours per request = 43,098 hours).

Issuance and Review of Notice of Adverse Action (7 CFR 273.13(a)): The Department estimates approximately 282,056 additional individuals across 53 State agencies are newly subject to the ABAWD work requirement and time limit, will become ineligible after three countable months, and will receive the Notice of Adverse Action. This estimate is based on the Department's projections of the average SNAP caseload from FY 2025 through FY 2030 and projections of the number of individuals aged 50 to 54 who will be newly subject to the time limit, are not working at least 20 hours, are not exempt, and do not live in an area covered by a waiver. The estimated total burden on State agencies for this provision is 18,804 hours (53 State agencies x 5,321.81 responses per State agency x 0.067 hours per request = 18,804 hours). The estimated total burden on individuals for this provision is 18,804 hours (282,056 individuals x 1 response per individual x 0.067 hours per request = 18,804 hours).

Screening for Work Requirements

The ongoing burden of the requirements to screen individuals is 3,726,038.39 hours (1,863,019.19 hours on State agencies and 1,863,019.19 hours on individuals).

Screening for Exemptions from General Work Requirements at Initial Application (7 CFR

273.7(b)(3)): The Department estimates 53 State agencies will screen approximately 16,549,000 individuals for exemptions from the general work requirements at initial application, based on the number of non-elderly participants reported in Table A.23 of the “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2022” report. The estimated total burden on State agencies for this provision is 1,103,267 hours (53 State agencies x 312,245.28 responses per State agency x 0.067 hours per request = 1,103,267 hours). The estimated total burden on individuals for this provision is 1,103,267 hours (16,549,000 individuals x 1 response per individual x 0.067 hours per request = 1,103,267 hours).

Screening for Exemptions from the General Work Requirements at Recertification Application

(7 CFR 273.7(b)(3)): The Department estimates 53 State agencies will screen 2,638,868 individuals for exemptions from the general work requirements at recertification application, based on the number of work registrants reported in Table A.25 of the “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2022” report (5,180,000 individuals). The estimated total burden on State agencies for this provision is 175,925 hours (53 State agencies x 49,789.96 responses per State agency x 0.067 hours per request = 175,925 hours). The estimated total burden on individuals for this provision is 175,925 hours (2,638,868 individuals x 1 response per individual x 0.067 hours per request = 175,925 hours).

Screening for Exceptions from the Time Limit at Initial Application (7 CFR 273.24(k)): The

Department estimates 53 State agencies will screen approximately 5,180,000 individuals for

exceptions from the time limit at initial application, based on the number of work registrants reported in Table A.25 of the “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2022” report. The estimated total burden on State agencies for this provision is 345,333 hours (53 State agencies x 97,735.85 responses per State agency x 0.067 hours per request = 345,333 hours). The estimated total burden on individuals for this provision is 345,333 hours (5,180,000 individuals x 1 response per individual x 0.067 hours per request = 345,333 hours).

Screening for Exceptions from the Time Limit at Recertification Application or During the Certification Period (7 CFR 273.24(k)): The Department estimates 53 State agencies will screen 3,577,420 individuals for the exceptions from the time limit at recertification application or during the certification, based on the Department’s projections of the average SNAP caseload from FY 2025 through FY 2030 and projections of the share of ABAWDs in the caseload after implementation of changes to ABAWD eligibility (approximately 9.2% of the SNAP caseload). The estimated total burden on State agencies for this provision is 238,495 hours (53 State agencies x 37,498.49 responses per State agency x 0.067 hours per request = 238,495 hours). The estimated total burden on individuals for this provision is 238,495 hours (3,577,420 individuals x 1 response per individual x 0.067 hours per request = 238,495 hours).

Table 1a: Annual Burden Estimates

Activity	Citation	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden	Previously Approved Burden Hours	Change in Burden Hours Due to a Program Change	Total Change in Burden Hours
A	B	C	D	E = C x D	F	G = E x F	H	I = (G x H)	J	K = G - J	L = J + K
Start-Up Burden											
Affected Public: State Agencies											
Update of eligibility system with new requirements (including coding for modified exceptions, updating language on the Notice of Adverse Action and Consolidation Work Notice)	7 CFR 273.24(c) (7), (8), (9), and (10)	53	1	53	4,729	250,637	\$52.96	\$13,273,885.90	0	250,637	250,637
Update policy manuals, guidance, and other documents with new requirements	7 CFR 273.24(c) (7), (8), (9), and (10), 273.24(k), 273.24(l), 273.7(b)(3)	53	1	53	80	4,240	\$53.09	\$225,116.86	0	4,240	4,240
Develop and provide training to staff on new requirements	7 CFR 273.24(c) (7), (8), (9), and (10), 273.24(k), 273.24(l), 273.7(b)(3)	53	1	53	80	4,240	\$53.09	\$225,116.86	0	4,240	4,240
Take training on	7 CFR	105,030	1	105,030	2	210,060	\$32.15	\$6,752,609.77	0	210,060	210,060

new requirements	273.24(c) (7), (8), (9), and (10), 273.24(k), 273.24(l), 273.7(b)(3)										
Reporting Burden Total for Start-Up Burden		105,083	1	105,189	4.46	469,177	\$43.64	\$20,476,729.40	0	469,177	469,177
Ongoing Burden											
Affected Public: State Agencies											
<i>Applying Modified Exception Criteria</i>											
Additional verification of hours worked and countable months in another State at initial or recertification application for ABAWDs newly subject to the work requirement	7 CFR 273.2(f)(1), (f)(2), and (f)(8)(i)	53	9,757.93	517,171	0.0917	47,407	\$32.15	\$1,523,959.67	0	47,407	47,407
Additional issuance of the Consolidated Work Notice for ABAWDs newly subject to the work requirement	7 CFR 273.7(c)(1)	53	9,757.93	517,171	0.083	43,098	\$32.15	\$1,385,417.88	0	43,098	43,098
Additional review of the oral explanation of the work requirements for ABAWDs newly subject to the work requirement	7 CFR 273.7(c)(1)	53	9,757.93	517,171	0.083	43,098	\$32.15	\$1,385,417.88	0	43,098	43,098

Additional issuance of the Notice of Adverse Action for ABAWDs newly subject to the work requirement who do not meet it	7 CFR 273.13(a)	53	5,321.81	282,056	0.067	18,804	\$32.15	\$604,466.69	0	18,804	18,804
<i>Screening</i>											
Screening for exemptions from the general work requirement at initial application	7 CFR 273.7(b)(3)	53	312,245.28	16,549,000	0.067	1,103,267	\$32.15	\$35,465,720.59	0	1,103,267	1,103,267
Screening for exemptions from the general work requirement at recertification application	7 CFR 273.7(b)(3)	53	49,789.96	2,638,868	0.067	175,925	\$32.15	\$5,655,287.48	0	175,925	175,925
Screening for exceptions from the ABAWD work requirement and time limit at initial application	7 CFR 273.24(k)	53	97,735.85	5,180,000	0.067	345,333	\$32.15	\$11,101,119.87	0	345,333	345,333
Screening for exceptions from the ABAWD work requirement and time limit at recertification application or during the certification period	7 CFR 273.24(k)	53	67,498.49	3,577,420	0.067	238,495	\$32.15	\$7,666,673.40	0	238,495	238,495
<i>ABAWD Waivers</i>											

Preparation and submission of Labor Market Data to support ABAWD waiver request	7 CFR 273.24(f)	33	1	33	35	1,155	\$32.74	\$37,820.01	1,155	0	0
Preparation and submission of Labor Surplus Area designation or EB Trigger Notice criteria to support ABAWD waiver request	7 CFR 273.24(f)	2	1	2	4	8	\$37.38	\$299.06	8	0	0
Reporting Burden Sub-Total for Ongoing Burden to State Agencies		53	561,865.86	29,778,890.42	0.068	2,016,588.31	\$32.13	\$64,788,063.48	1,163	2,015,425	2,015,425
Affected Public: Individuals											
<i>Applying Modified Exception Criteria</i>											
Additional response to verification of hours worked and countable months in another State at initial or recertification application for ABAWDs newly subject to the work requirement	7 CFR 273.2(f)(1), (f)(2), and (f)(8)(i)	517,170.50	1	517,170.50	0.0917	47,407	\$22.74	\$1,078,041.91	0	47,407	47,407
Additional review of of the Consolidated Work Notice for ABAWDs newly subject to the work requirement	7 CFR 273.7(c)(1)	517,170.50	1	517,170.50	0.083	43,098	\$22.74	\$980,038.10	0	43,098	43,098

Additional review of the oral explanation of the work requirements for ABAWDs newly subject to the work requirement	7 CFR 273.7(c)(1)	517,170.50	1	517,170.50	0.083	43,098	\$22.74	\$980,038.10	0	43,098	43,098
Additional review of the Notice of Adverse Action for ABAWDs newly subject to the work requirement who do not meet it	7 CFR 273.13(a)	282,056	1	282,056	0.067	18,804	\$22.74	\$427,596.90	0	18,804	18,804
<i>Screening</i>											
Screening for exemptions from the general work requirement at initial application	7 CFR 273.7(b)(3)	16,549,000	1	16,549,000	0.067	1,103,267	\$22.74	\$25,088,284.00	0	1,103,267	1,103,267
Screening for exemptions from the general work requirement at recertification application	7 CFR 273.7(b)(3)	2,638,868	1	2,638,868	0.067	175,925	\$22.74	\$4,000,523.77	0	175,925	175,925
Screening for exceptions from the ABAWD work requirement and time limit at initial application	7 CFR 273.24(k)	5,180,000	1	5,180,000	0.067	345,333	\$22.74	\$7,852,880.00	0	345,333	345,333
Screening for exceptions from the ABAWD work requirement and time limit at recertification	7 CFR 273.24(k)	3,577,420	1	3,577,420	0.067	238,495	\$22.74	\$5,423,368.72	0	238,495	238,495

application or during the certification period											
Reporting Burden Sub-Total for Ongoing Burden to Individuals		29,778,855.42	1	29,778,855.42	0.068	2,015,425.31	\$22.74	\$45,830,771.49	0	2,015,425.31	2,015,425.31
Reporting Burden Total for Ongoing Burden		29,778,908.42	2	59,557,745.85	0.068	4,032,013.61	\$27.44	\$110,618,834.97	1,163	4,030,850.61	4,030,850.61
Reporting Burden Total for All Burden (Start-Up + Ongoing)		29,883,991.42	2	59,662,934.85	0.075	4,501,190.61	\$29.12	\$131,095,564.36	1,163	4,500,027.61	4,500,027.61

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

Total annual costs to respondents are estimated at \$88,482,227.47 , representing total State worker costs, minus 50 percent of the administrative costs incurred by State agencies that are reimbursed by the Department. The estimated cost to respondents for each individual component of this information collection, including the number of respondents and annual hour burden is shown and described in Table 2 below.

To determine the burden costs to State agencies associated with this rule, the Department used wage rates based on the Bureau of Labor and Statistics (BLS) Occupational Employment Statistics estimates from May 2023 and then multiplied the wage rates by 1.33 to reflect fully-loaded wages. For State Agency Program Staff, the Department used the median hourly wage for Occupation Code 43-4061: Eligibility Interviewers, Government Programs ($\$24.17 \times 1.33 = \32.15).¹ For State Agency Program Managers, the Department used the median hourly wage for Occupation Code 11-9151: Social and Community Service Managers for State Government ($\$39.92 \times 1.33 = \53.09).² For updates to the eligibility system, the Department used the median hourly wage for Occupation Code 15-0000: Computer and Mathematical Operations for State Governments ($\$39.82 \times 1.33 = \52.96).³

To determine the burden costs to individuals associated with this rule, the Department used data from the BLS Current Population Survey data to calculate the average median weekly earnings for full time workers over age 16, converted the earnings into an hourly wage rate, and applied a

¹ https://www.bls.gov/oes/2023/may/oes_nat.htm

² https://www.bls.gov/oes/2023/may/naics4_999200.htm#11-9151

³ https://www.bls.gov/oes/2023/may/naics4_999200.htm#15-0000

20 percent reduction to account for taxes and other work-related costs. Using the last four quarters of data available (2023 Quarter 3 through 2024 Quarter 2), the average median weekly wage for full-time workers over age 16 is \$1,137 per week, or \$28.43 per hour.⁴ After applying the 20 percent discount, the median hourly wage is \$22.74.

Table 2: Estimated Cost to Respondents

Activity	Annual Burden Hours	Hourly Wage Rate	Cost (US \$)
Affected Public: State Agencies			
<i>Start-Up Costs</i>			
Update of eligibility system with new requirements (including coding for modified exceptions, updating language on the Notice of Adverse Action and Consolidation Work Notice)	250,637	\$52.96	\$13,273,885.90
Update policy manuals, guidance, and other documents with new requirements	4,240	\$53.09	\$225,116.86
Develop and provide training to staff on new requirements	4,240	\$53.09	\$225,116.86
Take training on new requirements	210,060	\$32.15	\$6,752,609.77
<i>Estimated Start-Up Costs (Before 50% Federal reimbursement)</i>			\$20,476,729.40
<i>Ongoing Costs</i>			
Additional verification of hours worked and countable months in another State at initial or recertification application for ABAWDs newly subject to the work requirement	47,407	\$32.15	\$1,523,959.67
Additional issuance of the Consolidated Work Notice for ABAWDs newly subject to the work requirement	43,098	\$32.15	\$1,385,417.88
Additional review of the oral explanation of the work requirements for ABAWDs newly subject to the work requirement	43,098	\$32.15	\$1,385,417.88
Additional issuance of the Notice of Adverse Action for ABAWDs newly subject to the work requirement who	18,804	\$32.15	\$604,466.69

⁴ <https://beta.bls.gov/dataViewer/view/timeseries/LES1252881500>

do not meet it			
Screening for exemptions from the general work requirement at initial application	1,103,267	\$32.15	\$35,465,720.59
Screening for exemptions from the general work requirement at recertification application	175,925	\$32.15	\$5,655,287.48
Screening for exceptions from the ABAWD work requirement and time limit at initial application	345,333	\$32.15	\$11,101,119.87
Screening for exceptions from the ABAWD work requirement and time limit at recertification application or during the certification period	238,495	\$32.15	\$7,666,673.40
Preparation and submission of Labor Market Data to support ABAWD waiver request	1,155	\$32.74	\$37,820.01
Preparation and submission of Labor Surplus Area designation or EB Trigger Notice criteria to support ABAWD waiver request	8	\$37.38	\$299.06
<i>Estimated Ongoing Costs to State Agencies (Before 50% Federal reimbursement)</i>			\$64,826,182.55
<i>Estimated Total Cost to State Agencies (Before 50% Federal reimbursement)</i>			\$85,302,911.95
<i>Total Cost to State Agencies (State worker cost minus 50% Federal reimbursement)</i>			\$42,651,455.97
Affected Public: Individuals			
<i>Ongoing Costs</i>			
Additional verification of hours worked and countable months in another State at initial or recertification application for ABAWDs newly subject to the work requirement	47,407	\$22.74	\$1,078,041.91
Additional review of the Consolidated Work Notice for ABAWDs newly subject to the work requirement	43,098	\$22.74	\$980,038.10
Additional review of the oral explanation of the work requirements for ABAWDs newly subject to the work requirement	43,098	\$22.74	\$980,038.10
Additional review of the Notice of Adverse Action for ABAWDs newly subject to the work requirement who do not meet it	18,804	\$22.74	\$427,596.90
Screening for exemptions from the general work requirement at initial application	1,103,267	\$22.74	\$25,088,284.00
Screening for exemptions from the	175,925	\$22.74	\$4,000,523.77

general work requirement at recertification application			
Screening for exceptions from the ABAWD work requirement and time limit at initial application	345,333	\$22.74	\$7,852,880.00
Screening for exceptions from the ABAWD work requirement and time limit at recertification application or during the certification period	238,495	\$22.74	\$5,423,368.72
<i>Estimated Total Costs to Individuals</i>			\$45,830,771.49
Total Costs to Respondents (State Agencies + Individuals)			\$88,482,227.47

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 other capital/start-up or ongoing operation/maintenance costs associated with this information collection.

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 for this information collection is

\$42,658,358.01. This includes the reimbursement of 50 percent of the administrative costs incurred by State agencies (\$42,651,455.97) and the Federal costs associated with drafting and reviewing the information collection request (\$6,902.04). The Federal cost is based on 80 hours of draft by a Program Analyst (GS-13/1) and ten hours of review by a Branch Chief (GS-14/1) for the information collection request. the Department used the hourly wage rates for the locality pay area of Washington-Baltimore-Arlington (\$56.52 and \$66.79, respectively).⁵ The

⁵ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/>

Department then multiplied this wage rate by 1.33 to reflect fully-loaded wages (\$75.17 and \$88.83, respectively). The calculations for this cost are described in Table 3 below.

Table 3: Total Annual Cost to the Federal Government

Activity	Estimated Total Annual Burden Hours	Estimated Hourly Wage Rate	Cost (US\$) (approx.)
Preparation of Information Collection			
Drafting – National Office Program Analyst (GS 13/1)	80	\$75.17	\$6,013.73
Reviewing – National Office Branch Chief (14/1)	10	\$88.83	\$888.31
<i>Costs to Federal Workers</i>			\$6,902.04
<i>Add 50% Federal Share of State Cost</i>			\$42,651,455.97
Total Cost to Federal Government (Federal workers cost + 50% State Cost)			\$42,658,358.01

A15. Explanation of program changes or adjustments.

This submission is a revision of an existing information collection as a result of program changes and will add 4,504,707.61 hours of burden to OMB’s inventory. This represents an increase to the burden hours for OMB Control Number 0584-0479, resulting in a total inventory of 4,501,190.61burden hours (4,504,707.61new burden hours + 1,163 existing burden hours) and 59,662,934.85responses (59,662,899.85 new responses + 35 existing responses).

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 83-I, 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.