

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0672:

Supplemental Nutrition Assistance Program (SNAP): Mobile Payment Pilots (MPPs)

Alexandria Wickman

Program Analyst

Supplemental Nutrition Assistance Program (SNAP)

USDA, Food and Nutrition Service

1320 Braddock Place

Alexandria, VA 22314

Table of Contents

A1. Circumstances that make the collection of information necessary.....	3
A2. Purpose and Use of the Information.....	4
A3. Use of information technology and burden reduction.....	4
A4. Efforts to identify duplication.....	5
A5. Impacts on small businesses or other small entities.....	5
A6. Consequences of collecting the information less frequently.....	5
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.....	7
A10. Assurances of confidentiality provided to respondents.....	8
A11. Justification for any questions of a sensitive nature.....	8
A12. Estimates of the hour burden of the collection of information.....	8
A13. Estimates of other total annual cost burden.....	12
A14. Provide estimates of annualized cost to the Federal government.....	12
A15. Explanation of program changes or adjustments.....	13
A16. Plans for tabulation, and publication and project time schedule.....	13
A17. Displaying the OMB Approval Expiration Date.....	14
A18. Exceptions to the certification statement identified in Item 19.....	14

Appendices

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

Appendix B: Public Comments

Appendix C: 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 of an existing information collection. Title 7 Section 2016 (h)(14) of the U.S. Code (“the Code”, Appendix A), as amended by Section 4006(e) of the Agricultural Act of 2018 (P.L. 115-334), requires the Food and Nutrition Service (FNS) to authorize the use of mobile payment technology for accessing Supplemental Nutrition Assistance Program (SNAP) benefits through smart phones, tablets, and other personal mobile devices in place of Electronic Benefit Transfer (EBT) cards. In order to implement this statutory requirement, FNS approved proposals from SNAP State agencies (State agencies) to conduct Mobile Payment Pilots (MPPs) that test the use of mobile payment technology in SNAP and meet several sets of requirements outlined in the Code, such as providing protections to participants that is similar to existing EBT technology, providing price parity between foods purchased with mobile payment technology and those purchased by other methods, ensuring adequate documentation and security measures to deter fraud, and other criteria as determined by FNS.

A2. Purpose and Use of the Information.

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

To achieve the statutory obligations outlined in A1, FNS requests OMB approval under the Paperwork Reduction Act to approve up to 5 State agencies that, in partnership with private, for-profit, EBT stakeholders and authorized SNAP retailers, will implement MPPs that test the use of mobile payment technology by SNAP households to access and redeem program benefits. This information collection request seeks OMB approval for implementation of MPPs by State

agencies. FNS will seek a separate OMB approval under the Paperwork Reduction Act to evaluate the data, findings, and observations from completed MPPs.

1. MPP Implementation

Per Title 7 Section 2016 (h)(14) of the Code, FNS has invited State agencies with the highest rated Request for Volunteers (RFV) proposals to implement an MPP. The burden for the RFV process was included in the previous OMB approval for this information collection, but that process has concluded. Therefore, FNS is removing the RFV burden with this revision. FNS requires respondents to implement an MPP for a minimum of 9 months and a maximum of 18 months, but estimate that, because respondents may join on a rolling basis in a given year, respondents will implement an MPP for an average of 12 months. FNS estimates that each of the selected State agencies will conduct the following activities for each month of implementation of an MPP, which assumes one full-time employee working 20 hours a week in response to this information collection:

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

FNS also estimates each of the State agencies will issue 1 recruitment notice soliciting participation in an MPP to 5,000 individuals who are members of SNAP households, for a total of 25,000 individuals. FNS estimates that approximately 15,000 SNAP individuals will read the notice and 10,000 will not (non-respondents). These notices may be issued electronically or via mail depending on the process used by each State agency. The notices/letters may include information about the pilot project, the basic requirements for participation, and how/where to contact the State agency to express interest in participation. Generating and issuing the 25,000 notices is expected to take approximately 3 minutes (0.05 hours) per notice. FNS also estimates that each of the 15,000 individual household members who read the recruitment notice will require up to 3 minutes (0.05 hours) to read the notice. FNS estimates that 5,000 of the recruited participants will opt to participate in the pilot (1,000 per State) and that each of the 5,000 participants will require 30 minutes (0.5) to enroll in an MPP. Potential enrollment activities for SNAP household respondents are based on the assumed model in this information collection may include calling or emailing the State agency to indicate interest, reviewing instructions, downloading a mobile application, technical assistance, and enrollment through the application. SNAP participants in the MPP would be responsible for using their own smart devices for the pilot, as necessary.

This information is necessary for State agencies, private EBT stakeholders, and SNAP household members to participate in an MPP. Through the MPPs, FNS will obtain data, observations, and findings that will allow the agency to evaluate the feasibility of integrating mobile payments with current SNAP technology and determine whether allowing mobile payments is in the best interest of the Program and inform best practices for making mobile payments a transaction method that is available to SNAP recipients nation-wide.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FNS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections.

A4. Efforts to identify duplication.

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

There is no similar data collection available. Every effort has been made to avoid duplication.

FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection has been held to the minimum required for the intended use. FNS estimates that at least 1% of respondents will be small businesses.

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The Agricultural Act of 2018 authorizes the use of a pilot as a means to determine the feasibility of a national mobile payment program and requires the submission of a report to Congress on the

basis of our findings. The information collected for the implementation of this pilot will only be collected once.

The information collected in the pilot will help FNS determine the success of and best practices for the use of mobile payment technologies to redeem SNAP benefits and enable the agency to prepare the required report to Congress.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**

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

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FNS published a notice soliciting comments regarding this information collection on August 23, 2024, in the Federal Register (FR) at [Volume 89 Page 68128](#). The public comment period ended on October 22, 2024. FNS received three comments in response to the FR notice. One comment was directly related to the information collection but did not provide substantive feedback. The other two comments did not contain information relevant to the information collection. The comments received are included in “Appendix B: Public Comments.”

On February 6, 2024, SNAP consulted with three individuals regarding this collection. The three individuals/organizations consulted about the information collection are listed in the table below.

Name	Agency	Email
Ron D.	Illinois Department of Human Services	Ron.Delay@illinois.gov
Tess M.	Oklahoma Department of Human Services	Tess.Murlin@okdhs.org
Molly M.	Missouri Department of Social Services	Molly.Morgan@dss.mo.gov

FNS did not received any responses from these contacts. As there was no feedback provided, FNS is confident in the information provided in the estimate.

A9. Explain any decisions to provide any payment or gift to respondents.

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

A10. Assurances of confidentiality provided to respondents.

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

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

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

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

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

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

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

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

Deea Coleman, USDA FNS Privacy Officer, reviewed this submission and indicated on March 21, 2025, that she had no privacy-related concerns.

A11. Justification for any questions of a sensitive nature.

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

There are no questions of a sensitive nature included in this information collection. Any sensitive information that may be associated with the MPP is collected during the SNAP application process, which is separate from the MPP. The SNAP application information collection is detailed in OMB Control Number 0584-0064, expiration 06/30/2027.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

There are three affected public (1) State, Local or Tribal Government; (2) Business-for-profit and (3) Individuals/Households. The reporting burden for this information collection includes 25,121 unique respondent types (3 State SNAP Agencies + 3 EBT Processor + 106 SNAP Retailers + 5 Mobile Payment Vendors + 25,000 SNAP Recipients), 55,798 total annual responses (including 45,798 responses and 10,000 non-responses), and 54,642 estimated total burden hours. The estimated burden for this information collection including the number of respondents and non-respondents, frequency of response, average time to respond and annual hourly cost burden are shown in the attached Burden Table (Appendix C). Any burden associated with submitting waiver requests to FNS during the MPP is covered under OMB Control Number 0584-0083 (“Operating Guidelines, Forms, and Waivers, Program and Budget Summary Statement (Forms FNS-366A & FNS-366B)”), expiration 09/30/2026. Estimates associated with the RFV process have been removed with this revision. As such, the burden has decreased by 318 responses and 23,510 hours.

A summary of the burden estimates appears below.

Table 1: Total Reporting Burden

Respondent Type	Burden Activity	Respondents						Non-Respondents					Grand Annual Burden Hours	Hourly Cost (Fully Loaded)	Total Annual Burden Cost
		Sample Size	Number of Respondents	Annual Frequency of Response	Total Annual Responses	Hours Per Response	Total Estimated Annual Burden	Estimated Number of Non-Respondents	Annual Frequency of Response	Total Annual Responses	Hours Per Response	Total Estimated Annual Burden			
A	B	C	D	E	F = D x E	G	H = F x G	I	J	K = I x J	L	M = K x L	N = H + M	O	P = N x O
State SNA	Request for	N/A	0	0	0	0	0	0	0	0	0	0	0	\$0.00	\$0.00

P Agencies	Volunteers - Preparation and Submission of Application														
	Request for Volunteers - Stakeholder Coordination	N/A	0	0	0	0	0	0	0	0	0	0	0	\$0.00	\$0
	Mobile Payment Pilot – Design & System Changes	N/A	5	12	60	80	4,800	0	0	0	0	0	4,800	\$17.27	\$82,896
	Mobile Payment Pilot – System Testing	N/A	5	12	60	80	4,800	0	0	0	0	0	4,800	\$17.27	\$82,896
	Mobile Payment Pilot – Issue Recruitment Notices	N/A	5	5,000	25,000	0	2,075	0	0	0	0	0	2,075	\$17.27	\$35,835.25
	Mobile Payment Pilot – Implementation & Support	N/A	5	12	60	120	7,200	0	0	0	0	0	7,200	\$17.27	\$124,344
	Mobile Payment Pilot – Stakeholder Coordination	N/A	5	12	60	80	4,800	0	0	0	0	0	4,800	\$17.27	\$82,896
	State Agency Subtotal		5	5,048	25,240	0.94	23,675	0	0	0	0	0	23,675	17.27	\$408,867.25
EBT Processors	Request for Volunteers - Coordination	N/A	0	0	0	0	0	0	0	0	0	0	0	\$0	\$0
	Mobile Payment Pilot - Coordination	N/A	5	12	60	120	7,200	0	0	0	0	0	7,200	\$77.37	\$557,064
SNA P Retailers	Request for Volunteers - Coordination	N/A	0	0	0	0	0	0	0	0	0	0	0	\$0	\$0

	<i>nation</i>														
	Mobile Payment Pilot - Coordination	N/A	10	12	120	120	14,400	0	0	0	0	0	14,400	\$77.37	\$1,114,128.00
Mobile Payment Vendor	Request for Volunteers - Coordination	N/A	0	0	0	0	0	0	0	0	0	0	0	\$0	\$0
	Mobile Payment Pilot - Coordination	N/A	5	12	60	120	7,200	0	0	0	0	0	7,200	\$77.37	\$557,064
Business Subtotal			20	12.00	240	120	28,800	0	0	0	0	0	28,800	\$77.37	2,228,256
SNAP Recipients	Mobile Payment Pilot – Review Recruitment Notice	25,000	15,000	1	15,000	0.05	750	10,000	1	10,000	0.0167	167	917	\$7.25	\$6,648.25
	Mobile Payment Pilot – Complete Enrollment	N/A	5,000	1	5,000	0.25	1,250	0	0	0	0.00	0	1,250	\$7.25	\$9,062.50
Individual/Household Subtotal			15,000	1.33	20,000	0.10	2,000	10,000	1	10,000	0.0167	167.00	2,167.00	\$7.25	\$15,710.75
Totals			15,025	3.03	45,480	1.20	54,475	10,000	1	10,000	0.0167	167.00	54,642.00	\$48.55	\$2,652,834

Recordkeeping Burden:

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

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

The annual estimated cost to respondents is \$2,652,834 including fully loaded wages. This estimate of respondent cost is based on the burden estimates and utilizes wage data from both the May 2023 Occupational Employment Statistics published by the U.S. Department of Labor, Bureau of Labor Statistics ([Occupational Employment Statistics | bls.gov](https://www.bls.gov/occupational-employment-statistics)), and current Federal minimum wage rate data as reported by the U.S. Department of Labor ([Minimum Wage | U.S.](https://www.dhs.gov/minimum-wage)

[Department of Labor | dol.gov](https://www.dol.gov)). To estimate the respondent cost for the State agencies, FNS used the mean hourly wage rate of \$25.97 for [Community and Social Service Specialists](#). FNS then multiplied \$25.97 by 1.33 to account for fully loaded wages, which equals \$34.54. Finally, because FNS reimburses State agencies for 50 percent of SNAP administrative costs, FNS divided \$32.29 by 0.5 for an adjusted annual hourly cost of \$17.27. To estimate the hourly cost for the private-for-profit business (EBT Processors, Retailers, and Mobile Payment Vendors) as described in Section A2, FNS used the mean wage rate of \$66.40 for [Software Developers](#). When fully loaded, the mean wage rate for software developers is \$88.31. FNS used the current Federal minimum wage rate of \$7.25 per hour to calculate the hourly costs for individuals/household SNAP recipients. Individual/household wages are not fully loaded. See table in A12A for details.

A13. Estimates of other total annual cost burden.

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

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

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

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

The total annual cost to the Federal government is \$212,145.50 including fringe benefits. It is estimated that Federal employees receiving an average General Schedule (GS) grade 12 step 05 wage for the Washington DC area 2024 OMB Salary Table (\$54.05/hour), take approximately 80 hours to analyze data and a GS grade 14 step 04 (\$73.72/hour), take approximately 20 hours to approve and review data received from this information collection:

Program Analyst Staff:	$80 * \$54.05 = \$4,324$
Branch Chief Staff:	$20 * \$73.72 = \$1,474.40$
Total Federal Staff Cost:	\$5,798.40

An additional 33% of the estimated base annual staff cost to the Federal government must be added to represent fully loaded wages, equaling \$7,711.87. When added to the Federal share of State costs for the pilot (\$204,433.63), the total Federal cost is \$212,145.50.

Table 2: Federal Cost

Federal Staff Cost (Fully Loaded)	\$7,711.87
	\$204,433.63
Federal Share State Costs	
Total Federal Cost:	\$212,145.50

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

A15. Explanation of program changes or adjustments.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a revision to an information collection request as a result of a pilot program. Estimates associated with the RFV process have been removed with this revision. As such, the burden has decreased by 318 responses and 23,510hours.

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

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

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.