

SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-0064:
Supplemental Nutrition Assistance Program (SNAP) Forms:
Applications, Periodic Reporting, and Notices

Lisa Marie Adiaba
Program Analyst
Supplemental Nutrition Assistance Program
USDA, Food and Nutrition Service
1320 Braddock Place
Alexandria, Virginia 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.....	8
A4.	EFFORTS TO IDENTIFY DUPLICATION.....	9
A5.	IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....	10
A6.	CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....	10
A7.	SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....	11
A8.	COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.	11
A9.	EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....	17
A10.	ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....	17
A11.	JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....	18
A12.	ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....	19
A13.	ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....	22
A14.	PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....	22
A15.	EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....	23
A16.	PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....	24
A17.	DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....	25
A18.	EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....	25

Appendices

Appendix A: The Food and Nutrition Act of 2008

Appendix B: Parts 271, 272, and 273 of Title 7 of the Code of Federal Regulations

Appendix C: Public Comments

Appendix C1: Public Comment FRAC

Appendix C1a: FNS Response to FRAC

Appendix C2: Public Comment UCOWF

Appendix C2a: FNS Response to UCOWF

Appendix D: Food Programs Reporting System (FPRS) Form FNS 388 Images

Appendix E: Burden Table

Appendix F: Burden Narrative

A1. Circumstances that make the collection of information necessary.

Explain the 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 a currently approved collection that is associated with the application and certification procedures of the Supplemental Nutrition Assistance Program (SNAP) required by the Food and Nutrition Act of 2008 (the Act), as amended. The Act is included in “Appendix A: The Food and Nutrition Act of 2008.” The Federal regulations for implementing these procedures are contained in Title 7 of the Code of Federal Regulations (CFR) in Parts 271, 272, and 273. Part 271 contains general information and definitions, Part 272 contains requirements for participating State agencies, and Part 273 contains procedures for the certification of eligible households. These regulations are included in “Appendix B: Parts 271, 272, and 273 of Title 7 of the Code of Federal Regulations.”

This information collection is necessary to verify household eligibility for SNAP benefits, confirm household eligibility throughout participation in the program, and ensure that households receive the correct benefit amount. State agencies are responsible for determining the eligibility of applicant households and issuing benefits to those households entitled to benefits under the Act. Any information collected is limited only to what is necessary for the administration and enforcement of SNAP.

FNS evaluated whether this information is essential for submittal and confirms that this information is necessary to comply with the Act and the Federal regulations listed above. Regulations provide State agencies with flexibility to tailor the program and ease administrative

burden where possible, including through policy options such as simplified reporting (which requires households to report changes in their circumstances less frequently), electronic client notices, and telephone interviews.

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 is a revision of the currently approved information collection burden under Office of Management and Budget (OMB) Control Number 0584-0064, “Supplemental Nutrition Assistance Program (SNAP) Forms: Applications, Periodic Reporting, and Notices.” To determine initial and continued eligibility for SNAP, applicants must provide, and State agencies must verify, various information on household members, such as age, income, resources, allowable deductions, and Social Security Numbers (SSNs). This information must be collected to ensure households are eligible for SNAP, receive the correct benefit, and maintain eligibility for the program. Any information collected is limited only to what is necessary for the administration and enforcement of SNAP per Federal regulations in 7 CFR Parts 271, 272, and 273. This information collection is mandatory for State agencies that administer SNAP, as they are responsible for accepting applications from, and determining eligibility for, individuals and households (hereinafter referred to simply as “households”) that apply for SNAP. While a response is voluntary for households that apply for SNAP, it is required in order for them to obtain or maintain SNAP benefits from their State agency.

Information that State agencies collect is generally not shared with any organization outside of the U.S. Department of Agriculture (USDA), except for certain disclosures of applicant information to certain third parties. State agencies are limited in the use or disclosure of information obtained from SNAP application forms or contained in case files of participating SNAP households to certain persons, specifically those directly connected with: the administration of SNAP; the administration of other Federal or Federally assisted means-tested programs; 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 for the purpose of investigating an alleged violation of the Act or SNAP regulations; local, State, or Federal law enforcement for the purpose of investigating if a household member is a fleeing felon or a parole violator; and agencies of the Federal Government for the purposes of collecting the amount of an over issuance from Federal pay.

The information collected by State agencies and electively provided by households upon initial application and then recertification (an application to continue participation in the program after an initial period of eligibility) includes personal identifiable information (PII) such as name, date of birth, social security number, as well as information about various household circumstances, such as household size and income. Applications are available in electronic and paper format. FNS provides technical assistance as State agencies design and implement new systems and/or enhancements for online applications. Once electively provided by households, State agencies must verify application information provided to determine their SNAP eligibility and benefit amounts, and then conduct an interview with the applicant household. Interviews are conducted in person or over the telephone based on the option selected by the household. The information

requirements for recertification are similar, but slightly reduced compared to those for initial application. Households with regular earned income are generally required to recertify every 12 months, although the recertification period can be as little as one month, or as long as two years, based on their circumstances.

As part of the initial application and recertification process, State agencies are required to issue certain notices to households. This include notices when an application is denied, if an application is missing information, if a household misses their interview, if household benefits will soon expire, if household benefits will change, and when household benefits officially change. Notices provided by State agencies can be issued electronically or by paper.

Following initial certification or recertification, households are required to notify the Food and Nutrition Service (FNS) of any changes to their household status on a quarterly basis, monthly basis, or whenever a change occurs based on the reporting options chosen by their State agency, in order to maintain SNAP benefits and eligibility. Most State agencies also use simplified or periodic reporting, which requires households to report only certain changes to their status during the certification period. All reporting requirements can be completed electronically or by paper.

Under recordkeeping requirements, State agencies must maintain records to ascertain whether the program is administered in compliance with Federal statutes and regulations. State agencies must maintain case records of households participating in SNAP for a period of three years from the date of origin. In addition, State agencies must also maintain the ability to search household case records in order to prevent individuals from receiving benefits in more than one household, and to prevent households from receiving benefits in more than one jurisdiction (commonly

referred to as “duplicate participation”). Records can be maintained using automated retrieval systems rather than paper records.

In the process of renewing this information collection, FNS added burden hours to reflect program changes related to two final rules, “Employment and Training Opportunities in the Supplemental Nutrition Assistance Program” (86 FR 358, published January 5, 2021) and “Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances” (87 FR 59633, RIN 0584-AE75 and published December 2, 2022).

The final rule, “Employment and Training Opportunities in the Supplemental Nutrition Assistance Program” (86 FR 358, published January 5, 2021) requires State agencies to consult with their State workforce development boards on the design of their employment and training (E&T) programs and to document in their E&T State plans the extent to which their E&T programs will be carried out in coordination with activities under title I of the Workforce Innovation and Opportunity Act (WIOA). The final rule also made changes to E&T components. As noted in the final rule, FNS is merging some of the burden associated with this rule (which FNS published in 88 FR 72419) with this collection by adding new reporting burden line items.

The interim final rule, “Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Duplicate Issuances” (87 FR 59633, RIN 0584-AE75 and published December 2, 2022)) requires State agencies to provide information to the National Agency Clearinghouse (NAC) regarding individuals receiving SNAP benefits in their States to ensure they are not already receiving benefits in another State. It also requires State agencies to take appropriate action with respect to each indication from the NAC that an individual may already

be receiving SNAP benefits from another State agency. FNS is merging most of the burden associated with this rule with this collection by updating existing verification and noticing burden estimates for both State agencies and individuals/households.

In addition to all the other burden activities, the collection activities associated with the two final rules described above and the associated burden estimates are displayed in the Burden Table (Appendix E) in the Burden Calculations tab, denoted with highlights. These requirements are also discussed in narrative form in the Burden Narrative (Appendix F), denoted with bold font and an asterisk before the burden activity title.

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. 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 requirements contained in this information collection. FNS provides funding to support State agencies' development of electronic systems through Federal matching of States' administrative costs.

Currently, all households have the option to submit information required to obtain or maintain eligibility and benefits for SNAP electronically to automated eligibility systems maintained by State agencies. State agencies submit 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> (FPRS Form images are included in “Appendix D: Food Programs Reporting System (FPRS) Form FNS 388 Images” approved under OMB Control Number: 0584-0594; Expiration Date: 09/30/2026); as such, we anticipate 100 percent of responses will be submitted electronically.

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 information collection. 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. FNS monitors State performance to ensure that the program is being efficiently and economically operated.

FNS receives aggregate level data on participation, benefits issued, and other basic program information from State agencies that administer SNAP to ensure integrity and compliance with the Food and Nutrition Act (the Act), SNAP regulations, and other relevant federal laws. The information required for this collection is not currently reported to any other entity outside of FNS on a regular basis in a standardized form.

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. FNS conducts Management Evaluations and Quality Control reviews to

assess SNAP State agency compliance with program rules. These reviews ensure States comply with regulatory requirements.

SNAP regulations permit State agencies to use multi-program forms and notices as a method for application. For example, most States use a joint application for the Temporary Assistance to Needy Families Program (TANF) and SNAP, which allow a household to apply for both programs with a single application form. Some States also include applications for the Medicaid Program and other general assistance programs with the TANF/SNAP application. While joint applications may reduce the reporting burden for some information, the forms may become too long and complicated if too many applications are combined, which may deter some households from applying. SNAP State agencies support households with the application process and requires appropriate bilingual personnel and printed materials be available for households that speak a language other than English. State outreach activities often include application assistance as well. Because of the numerous Federal or State means-tested programs with variations in eligibility rules and benefit criteria, although there is no similar data collection we can use in lieu of this data collection, there may be duplication of some information collection and reporting for both States and households.

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 information collection for State agencies that administer SNAP, and while information provided by household participation is voluntary, it is required for them to obtain and maintain SNAP eligibility and benefits. The information collected is for the purpose of certifying households for SNAP. If this information is not collected or collected less frequently, this would leave FNS and State agencies unable to implement the eligibility and certification standards set forth in the Act and SNAP regulations and could result in State agencies over-issuing or under-issuing benefits to eligible households or issuing 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.**

SNAP regulations (7 CFR 273.21) provide for a monthly reporting option to determine SNAP eligibility and benefits of the affected households. This requires households and State agencies to conduct reporting more frequently than a quarterly basis. This monthly collection is necessary to ensure the integrity of the program and to meet regulatory requirements. FNS notes that while all State agencies have the option to use monthly reporting, only one State uses this reporting system, and the number of households subject to this reporting system within the State is small.

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.

A 60-day notice was published in the Federal Register (FR) on September 12, 2023 (88 FR 62527). The Department received nineteen comments total. Seventeen comments were about the commentors' view of the SNAP program in general. They did not provide substantive feedback on the information collection's burden. Thus, FNS did not make changes to the burden estimates based on these comments. Two comments (Appendix C1 and C2) were relevant to the information collection. The responses to these comments are provided in Appendices C1a and C2a.

The first public comment came from the Food Research and Action Center (FRAC), a non-profit

advocacy organization. In their comment, FRAC recommended that SNAP client notices be written at or below an 8th grade reading level to minimize increased administrative burden on States and households due to difficulties understanding the notices. In response, FNS clarified notice requirements and program rules that require SNAP State agencies to write notices in clear and simple language and require States to meet bilingual requirements when sending client notices. and highlighted technical assistance tools that FNS has recently provided for State agencies to improve notice readability and comprehension.

Additionally, FRAC shared that the estimated burden hours are too low because of several factors: FNS's use of an outdated source for the total number of SNAP households; the backlogs and staffing issues State agencies are currently experiencing; and added burden on State agencies due to households calling with questions on notices. FNS does not agree with FRAC that the burden estimates need revision to account for backlogs and staffing issues or calls from clients related to notices because these factors either do not increase the burden associated with individual burden activities or are represented in the estimates FNS provided since they are meant to represent the average time per response.

FNS agreed with FRAC's comment that the household number included in the burden calculation is out-of-date and may unintentionally underrepresent the burden on State agencies and households. As such, FNS updated the total number of households reflected in the burden calculation from 18 million to 21 million, which represents the total number of households that received SNAP in Fiscal Year (FY) 2022, the most recent, non-preliminary full year of data available. By updating this figure, FNS also increased many other estimates in the burden, such as the estimated number of notices and verifications, since the household number underlies other

estimates.

Finally, FRAC suggested that State agencies would benefit from FNS providing guidance on how to improve technology and streamline data collection. FNS is committed to supporting State agencies' efforts to improve the quality and efficiency of SNAP application and eligibility determination systems and shared recent efforts on this topic with FRAC in response.

The second public comment came from the United Council on Welfare Fraud (UCOWF), a membership association and advocacy group. In response to the program changes FNS highlighted in its 60-day notice related to the interim final rule, "Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Duplicate Issuances" (87 FR 59633, RIN 0584-AE75 and published December 2, 2022)), UCOWF argued that FNS should address the causal factor increasing State agency and household burden, which they identified as the computer matching requirements established in 7 CFR 272.12. They note that the regulations prohibit Federal systems of records from being used efficiently due to ineffective communication between States. FNS appreciates the comment but notes that these regulations are consistent with Federal statute at 5 U.S.C. 552a(p). An act of Congress is needed to amend these requirements.

UCOWF also shared that the interim final rule creates unnecessary reporting burden for State agencies using the NAC because it does not align with flexibilities provided in the NAC pilot, such as the option to allow match results to be considered verified upon receipt. Again, FNS notes that unlike the NAC pilot, the nationwide NAC is a Federal system of records. Therefore, State agencies are required to adhere to computer matching requirements per 7 CFR 272.12 and

the Privacy Act at 5 U.S.C. 552a(p). An act of Congress is needed to amend these requirements.

Finally, UCOWF suggested that the burden does not consider the administrative costs associated with sending physical and electronic mailings. They also stated that five minutes is not enough time for households to read a notice due to the complex language and suggested this burden estimate be increased but did not offer suggestions for alternative estimates. FNS considered this comment but notes that it has consulted with State agencies when developing the notice estimate and could not find additional justification to support increasing the client burden associated with notices. As such, FNS maintained its estimates from the 60-day notice for this activity.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

The following individuals/organizations have been consulted about burden estimates and/or other characteristics associated with this data collection:

Contact	Organization
Daniel G.	Connecticut Department of Social Services
Jennifer R.	Utah Department of Workforce Services
Jerquitta H.	North Carolina Department of Health and Human Services
Natalie B.	Utah Department of Workforce Services
Marisa V.	New Mexico Human Services Department
Suzanne D.	New Mexico Human Services Department
Rick D.	Mississippi Department of

Contact	Organization
	Human Services
Virginia H.	South Dakota Department of Social Services

The Department received responses from two State agency contacts. One individual confirmed that they have no comments on the collection, so FNS did not make any changes to the burden estimates provided in the 60-day notice based on this response. The second individual agreed with all but four of the estimates provided. The individual recommended FNS increase the estimates for one burden activity related to the final rule, “Employment and Training Opportunities in the Supplemental Nutrition Assistance Program” (86 FR 358, published January 5, 2021) and three burden activities related to the final rule, “Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances” (87 FR 59633, RIN 0584-AE75 and published December 2, 2022).

The individual recommended FNS increase the time it takes State agencies to provide the list of available employment and training services to households from 1 to 5 minutes based on their understanding that State agencies must explain the list to applicants. FNS did not increase this burden estimate because State agencies are not required to explain the list to applicants as the commenter suggested.

This individual recommended FNS increase the time it takes State agencies to verify questionable information from a NAC match from six minutes to 10 minutes and the time it takes State agencies to send a Notice of Match Results related to a NAC match from three to 10 minutes because their State must send these notices manually rather than through an automated eligibility system process. Further, the individual recommended FNS increase the estimated time

it takes State agencies to send a Notice of Adverse Action (NOAA) associated with NAC matches from three to five minutes because the State agency must reassess the case in their eligibility system. FNS appreciates that some State agencies use manual processes to send notices, particularly for new requirements, but understands that many State agencies automate this process; therefore, FNS did not adjust the burden estimates based on this comment. FNS encourages State agencies to automate notices to the greatest extent possible. Further, the commenter primarily focused on these estimates in relation to NAC matches, but these estimates apply to all verifications of questionable information, Notice of Match Results, and NOAAs; therefore, while State agencies may require additional time for these activities for NAC, FNS maintains its estimate applies to the larger population of these activities.

In addition to the public comments and consultations noted above, FNS monitors State agency certification and reporting activities through annual management evaluations (OMB Control Number 0584-0010, Expiration Date: 8/31/2026). While not the focus of management evaluations, FNS gains valuable insight into the accuracy of the estimates included in this collection as part of this process, which includes staff interviews, shadowing opportunities, and client experience observations.

Further, FNS conducted a study in 2021 to understand the use of online applications across State agencies.¹ While the purpose of this study was to collect information about online application features, protocols and procedures used for processing online applications, and perceived advantages and challenges with using online applications, its finding assisted FNS in estimating the burden for applications and other certification activities. The study found that online

¹ <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAPOnlineApplications-Summary.pdf>

applications help to reduce caseworkers' time processing applications but didn't identify specific areas to reduce burden. FNS regularly provides technical assistance to States that have questions about their online applications. Additionally, FNS shares best practices with SNAP State agencies that focus on reducing burden, improving program access, and strengthening program integrity.

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. No confidential information is associated with this collection of information.

This information collection request was reviewed and cleared by FNS Privacy Officer, Deea Coleman, on January 29, 2024.

A11. Justification for any questions of a sensitive nature.

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

Section 16 (e) of the Act requires each household member to furnish his or her Social Security Number (SSN) to State agencies and for State agencies to use SSNs in administration of SNAP, but only to the extent necessary for the purposes of determining or verifying a household's eligibility and benefit level. Under SNAP regulations at 273.2(b)(4), while providing an SSN is voluntary, refusal of a household member to provide an SSN will result in the denial of eligibility for SNAP and benefits.

In addition, to comply with Civil Rights requirements, any State agency SNAP application form must contain a nondiscrimination statement and solicit racial/ethnic information from applicants. The applicant must be notified that reporting such information is voluntary and will not affect the household's eligibility or benefit determination.

This information collection request was reviewed and cleared by FNS Privacy Officer, Deea Coleman, on January 29, 2024.

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

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

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

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 E) and Burden Narrative (Appendix F). A summary of the burden appears below.

Reporting Burden: (53 State agencies and 21,620,718 Individuals/Households)

The reporting burden for this information collection includes 21,620,771 respondents, 900,328,587.62 total annual responses, and 138,273,419.28 estimated total hours. This update includes an increase of 18,093,195.69 total hours due to adjustments to reflect current SNAP caseload levels and more recent or accurate data sources, including an increase to the total number of households in response to a public comment on the 60-day notice that encouraged FNS to use more recent data. This update also includes an increase of 827,239.41 total hours due to program changes related to two final rules, described in more detail in Sections A2 and A15.

Affected Public	Est. No. of Respondents	No. of Responses Annually per Respondent	Total Annual Responses	Est. Hours per Response	Est. Total Burden Hours	Hourly Wage Rates
State agencies	53	8,621,423.67	456,935,454.40	0.13	60,242,709.49	\$29.39
Individuals/Households	21,620,718	20.51	443,393,133.21	0.18	78,030,709.79	\$22.02
Total Burden Estimate	21,620,771	41.64	900,328,587.62	0.15	138,273,419.28	\$25.23

Recordkeeping Burden: (2,724 Local or Tribal Government Agencies)

The recordkeeping burden for this information collection includes 2,724 respondents, 157,949,592 total annual records, and 4,526,260.99 estimated total hours. Local agencies are required to maintain case records for three years. Compared to the previous information collection, this is a decrease of 308,051.60 burden hours due to adjustments to reflect more recent or accurate data sources.

Affected Public	Est. No. of Recordkeepers	No. of Records per Recordkeeper	Total Annual Records	Est. Hours per Record	Est. Total Burden Hours	Hourly Wage Rates
State, Local, and Tribal Governments	2,724	57,984.43	157,949,592	0.03	4,526,260.99	\$34.65
Total Burden Estimate	2,724	57,984.43	157,949,592	0.03	4,526,260.99	\$34.65

Third-Party Disclosures Burden (53 State Agencies):

The third-party disclosures burden for this information collection includes 53 State agencies, 1,908 total annual disclosures, and 954 estimated total hours. FNS did not adjust or change the third-party disclosures burden as compared to the previous information collection.

Affected Public	No. of State Agencies	No. of Disclosures issues per State Agency	Total Annual Disclosures	Est. Hours per Disclosure	Est. Total Burden Hours	Hourly Wage Rates
State Agency disclosure to third parties	53	36	1,908	0.50	954	\$29.39
Total Burden Estimate	53	36	1,908	0.50	954	\$29.39

Total Burden

The total burden for this information collection includes 21,623,495 respondents,

1,058,280,087.62 total annual responses, and an estimated total burden of 142,800,634.27 hours.

For a description of all adjustments and changes to the burden and complete details on the burden calculations, see Burden Table (Appendix E) and Burden Narrative (Appendix F).

Summary	Est. No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Est. total Hours per Response	Est. total Burden
Reporting	21,620,771	41.64	900,328,587.62	0.15	138,273,419.28
Recordkeeping	2,724	57,984.43	157,949,592.00	0.03	4,526,260.99
Third-Party Disclosures	53	36.00	1,908.00	0.50	954
TOTAL	21,623,495	48.94	1,058,280,087.62	0.13	142,800,634.27

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

The estimate of respondent cost for State agencies and local agencies is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational and Wage Statistics, Occupational Group (43-4061) (<https://www.bls.gov/oes/current/oes434061.htm#nat>). The hourly mean wage for functions performed by State agency staff is estimated at \$22.10 per staff hour. The hourly mean wage for functions performed by local agency staff is estimated at \$26.05 per staff hour.

The estimate of respondent cost for households is estimated at \$22.02 per hour, based on the U.S. Department of Labor, Bureau of Labor Statistics median weekly earnings for full-time wage and salary workers, averaged for 2023, divided by 40 hours, with a 20 percent reduction to remove taxes and other work-related costs (<https://www.bls.gov/cps/data.htm>).

In total, the estimated annualized, fully loaded (x .33) cost to respondents after 50 percent reimbursement of State and local administrative costs from the Federal government is \$2,681,934,336.23. See tables in A12.A and Burden Table (Appendix E) 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.

There are no 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.

FNS estimates that a SNAP Branch Chief, General Schedule (GS) grade 14 step 1 (\$63.43/hour), and a SNAP program analyst, GS grade 12 step 1 (\$45.14/hour) will take approximately 20 and 500 hours, respectively, to analyze and update this information collection, totaling \$23,838.60 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf). The fully loaded (x .33) cost is \$31,707.20 in total. The Federal share of State and local agency costs is \$963,698,106.61. Thus, the total annual cost to the Federal government is \$963,729,813.81.

Labor Category	Activities	Hours	Fully-Loaded Hourly Wage Rate*	Dollars
Program Analyst (GS-12/1)	The hourly burden estimate associated with the development of the OMB package includes the time spent on contract activities, reviewing drafts of the burden estimates, making edits to these drafts, consulting the CFR to confirm estimates, providing feedback over email, drafting supporting statement and burden table elements, coordinating consultation contacts, communicating with the agency regulatory office, and sharing information with agency administrators.	500	\$60.04	\$30,020.00
Branch Chief (GS-14/1)	The hourly burden estimate associated with the development of the OMB package includes reviewing the draft burden estimates, discussing burden estimate elements, briefing agency administrators, and communicating with the agency regulatory office to move forward the process when needed.	20	\$84.36	\$1,687.20
Cost of Federal Workers				\$31,707.20
50% Federal Share of State and Local Agency Costs				\$963,698,106.61
Total				\$963,729,813.81

*Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf), x.33 to represent fully-loaded wages.

Labor Category	Activities	Hours	Fully-Loaded Hourly Wage Rate*	Dollars
----------------	------------	-------	--------------------------------	---------

A15. Explanation of program changes or adjustments.

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

This is a revision of a currently approved information collection. The currently approved burden for this data collection is 124,187,297 total annual burden hours and 937,793,285 total annual responses. In this revision, FNS is requesting 142,800,634 total annual burden hours and 1,058,325,968 total annual responses. The increase in burden and annual responses reflects both adjustments and program changes.

FNS modified the burden of some of its reporting and recordkeeping requirements to reflect current SNAP caseload levels and more recent or accurate data sources, where possible. These adjustments represent an increase of 18,613,337 total annual burden hours.

Additionally, FNS added burden hours to reflect program changes related to two final rules, “Employment and Training Opportunities in the Supplemental Nutrition Assistance Program” (86 FR 358, published January 5, 2021) and “Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances” (87 FR 59633, RIN 0584-AE75 and published December 2, 2022)). More information about these rules and the associated burden estimates are provided in Section A2 and the Burden Narrative (Appendix F). These program changes represent an increase of 827,239.41 total annual burden hours.

Together, these adjustments and program changes represent an increase of 120,532,683 total

annual responses and 18,613,337 total annual burden hours for 53 State agencies, 2,724 Local agencies, and 21,620,718 Individuals/Households compared to the last to the burden in the currently approved information collection. For more details on the burden calculations, see the Burden Table (Appendix E) and Burden Narrative (Appendix F).

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.