MEMORANDUM

To: Brenda Aguilar
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Shiela Corley
Chief of Staff
Food, Nutrition and Consumer Services
U.S. Department of Agriculture

Date: June 11, 2025

Subject: Nonsubstantive Change Request – Supplemental Nutrition Assistance Program (SNAP) Forms: Applications, Periodic Reporting, and Notices (OMB #0584-0064)

This memo requests approval of nonsubstantive changes to a currently approved collection that is associated with the application and certification procedures of the SNAP, as well as the issuance of SNAP benefits, required by the Food and Nutrition Act of 2008 (the Act), as amended. The Federal regulations for implementing these procedures are contained in Title 7 of the Code of Federal Regulations (CFR) in Parts 271, 272, 273 and 274.

The purpose of the changes is to add requirements to report to USDA a number of currently collected data elements related to SNAP certification and benefit issuance. These data elements will be covered under the newly established system of records entitled USDA/FNS-15, ‘‘National Supplemental Nutrition Assistance Program (SNAP) Information Database.’’

The collection of this data will be used to ensure program integrity, including by verifying the eligibility of benefit recipients. This is consistent with FNS’s statutory authority and the President’s Executive Orders, including Executive Order 14243—*Stopping Waste, Fraud, and Abuse by Eliminating Information Silos*, and will improve USDA’s ability to safeguard taxpayer dollars from abuse.

Background

In alignment with the Executive Order 14243, USDA will leverage data-sharing across federal and state systems to identify and rectify any ineligible, duplicate, or fraudulent SNAP enrollments and transactions. The primary objectives of this include ensuring that SNAP benefits are issued only to eligible individuals and households and are used lawfully, thereby protecting program funds and maintaining public trust.

This system will be owned, administered, and secured by the Food and Nutrition Service (FNS). Access to the system database and other federally funded databases will be limited to a small, vetted team of USDA program integrity analysts and IT administrators.

The system will not be exempt from any provisions of the Privacy Act.

USDA and FNS will use the SNAP data in this system to ensure the integrity of Government programs, including by verifying SNAP recipient eligibility against federally maintained databases, identifying and eliminating duplicate enrollments, and performing additional eligibility and program integrity checks. This includes but is not limited to verifying eligibility based on immigration status, identifying and eliminating duplicate enrollments, assisting States in mitigating identity theft, and performing other eligibility and program integrity checks using lawfully shared internal and interagency data.

This also includes sharing, where permitted by law and consistent with this notice, information with State agencies when necessary to investigate and rectify fraudulent or otherwise improper or illegal SNAP enrollments or transactions.

Overview of Requested Changes

The data elements to be included in the system[1], and to be reported to USDA pursuant to this change request are:

1. Personally-identifying information on individuals who have received, are currently receiving, or are applying to receive SNAP benefits, including:

- SNAP participant name;
- Social Security Number (SSN);
- Date of birth;
- Residential address; and
- Case record identifier number or other identifiers or data elements used to identify SNAP participants

These data elements are collected by State SNAP agencies as part of the certification process.

2. Information used to issue SNAP benefits and make them available for use by participants, including:

- Electronic Benefit Transfer (EBT) card number;
- Issuance amounts and benefit available dates for each participating household

These data elements are developed and held as records by either SNAP State agencies in preparing monthly benefit issuance files for use by EBT processors that issue SNAP benefits, or

[1] Note that while all of these collection and recordkeeping activities are currently required by Federal regulation, several are not properly reflected in currently-approved information collections. USDA is working with OMB-OIRA on correcting these errors in a subsequent change request. This is distinct from the new reporting requirements that are the subject of this change request.

(in the case of EBT card numbers) by the processors themselves in carrying out the issuance process.

For SNAP-participating households, most of these data elements are kept as records by State SNAP agencies and EBT processors those entities in support of their operations. No additional data collection or recordkeeping is sought through this change request. Rather, the change is limited to reporting these data elements to USDA.

A detailed burden table is transmitted as an Appendix to this memorandum, but the summary of changes requested are summarized below:

	Approved	Additional Requested	Revised Estimates
Respondents	21,623,495	2	21,623,497
Burden Hours	142,800,634	20,410	142,821,044
Responses	1,058,280,088	40,150	1,058,320,238

Please let us know if you have any questions.

Appendix: Burden Table for 0584-0064 updated 6-11-25 230PM