

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-NEW:**

**Supplemental Nutrition Assistance Program: Demonstration Projects**

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## **Appendices**

Appendix A: Legal Authority: Section 17(b) of the Food and Nutrition Act of 2008

Appendix B: 0584-NEW Appendix Burden Table

Appendix C: Simplified CAP Demo Request Template

Appendix D: ESAP Demo Request Template

Appendix E: SMD Request Template

Appendix F: Template for CAP Cost Neutrality Report Submission

Appendix G: ESAP Reporting Template (Change Reporting)

Appendix H: ESAP Reporting Template (Elderly Only - Waive Periodic Report)

Appendix I: ESAP Reporting Template (Waive Periodic Report)

Appendix J: SMD Reporting Template

Appendix K: Comment from CA DSS

Appendix L: Comment from CSPI

Appendix M: Comment from Anonymous

Appendix N: Response to comment from CSPI

**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 new information collection request for activities associated with SNAP demonstration projects. Demonstration projects allow State agencies to conduct approved pilot or experimental projects that waive requirements of the Food and Nutrition Act of 2008 (the Act) (7 U.S.C. 2011, et seq.) and SNAP regulations to test program changes to improve program administration, increase the self-sufficiency of SNAP recipients, and improve the delivery of benefits to eligible households. Section 17(b) of the Act authorizes the Food and Nutrition Service (FNS) to set the terms and conditions for—and oversee the conduct of — demonstration projects proposed by State agencies. The Act limits the provisions that FNS may waive and requires that approved demonstration projects must include an evaluation component. FNS collects information regularly to meet the evaluation component requirements using data reports.

Previously, this information has been collected without an OMB control number. FNS had historically considered demonstration projects to be part of the waiver process covered under OMB Control Number 0584-0083 (expiration 9/30/2026). However, after reevaluation, FNS understood that the evaluation component of demonstration projects makes them subject to separate IC requirements. FNS acted quickly to submit a 60-Day Notice and subsequent information collection. This information collection seeks to come into compliance with the Paperwork Reduction Act (PRA) for demonstration projects.

## 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 the actual use the agency has made of the information received from the current collection.

*In the response, identify the instrument by appendix reference/title with the activity described. How will this data be collected? Linking the data collection tools with the activities the respondents will complete.*

State agencies may voluntarily conduct demonstration projects that waive any requirements of the Act and any SNAP regulations to test program changes to improve program administration, increase the self-sufficiency of SNAP recipients, or improve the delivery of benefits to eligible households. To operate a demonstration project, State agencies must prepare and submit new project requests, project modifications, and project renewal requests to FNS for approval (Appendices C, D, and E). After review, FNS may issue a demonstration project approval, outlining the terms and conditions of the demonstration project. States must also prepare and submit data reports as part of the evaluation component to measure the project's intended outcomes and benefits (Appendices F, G, H, I, and J).

State agencies must complete and submit initial, modification, and extension requests (Appendices C, D, and E) in the SNAP Waiver Information Management System (WIMS) (OMB Control #0584-0083, expiration 9/30/2026). FNS uses the information provided by State agencies to evaluate and determine whether to approve or deny the demonstration project. Utilizing the templates in the virtual library, State agencies specify the following information in their request, including:

- The type of demonstration project request (e.g., Standard Medical Deduction (SMD), Elderly Simplified Application Project (ESAP), Community Partner Interview (CPI), Combined Application Project (CAP), non-merit projects, or novel projects, among others).
- The statutory and regulatory citations the demonstration project would waive.
- The justification for requesting the demonstration project (e.g., lessen administrative burden and increase program access).
- The description of alternative procedures that differ from regular SNAP, like eligibility, verification, and evaluation components for the demonstration project, among others.
- An evaluation plan.

After the demonstration project is approved, State agencies must submit data reports to assess the project's overall performance (Appendices F, G, H, I, and J). Data report requirements are detailed in the evaluation section of the demonstration project approval and may include, but is not limited to, selecting a case sample, conducting case reviews, and validating the findings. States complete demonstration project data reports using a combination of caseload-level data, SNAP Quality Control (QC) case review data, and, if needed, additional case reviews of client circumstances. Additional case reviews may be necessary if the minimum sample size for statistical analysis is not met through other means and involves a State reaching out to a household using the QC review process. For additional information on the estimated burden on households, please see Answer 12.

Data reports vary for each type of demonstration project. The most common types of reports

are annual and cost neutrality reports. Annual reports allow FNS to monitor demonstration project trends such as average caseload size, demographic data (e.g., older adults and people with disabilities) of the population participating in the demonstration project, timeliness, and payment error rates. Cost neutrality reports ensure that the implementation of a demonstration project does not significantly increase SNAP benefit costs. FNS analyzes program costs associated with demonstration projects to determine if any offsets are needed to protect Federal spending and maintain budget neutrality.

### **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.**

#### **Burden Reduction Efforts**

FNS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. As noted in A2, States submit pending demonstration requests, modification requests, extension requests, and data reports to FNS via WIMS. As such, we anticipate 100 percent of responses will be submitted electronically. FNS has templates for these documents, and reduced reporting frequency to reduce the burden on State agencies and individual SNAP households participating in demonstration projects.

### **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.**

Every effort has been made to avoid duplication and to utilize existing data sources wherever possible. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. There is no similar information collection process that exists to collect the information necessary for demonstration projects. FNS monitors State performance to ensure that the program is being efficiently and economically operated.

**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 for both the demonstration projects 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.**

Section 17(b) of the Food and Nutrition Act allows FNS to set the terms and conditions for, and oversee the conduct of, demonstration projects proposed by State agencies to test changes to aspects of SNAP's benefit structure and delivery system with the aim of increasing the efficiency of SNAP and improving delivery of SNAP benefits to eligible households. Initial demonstration project requests, modification and extension requests, and data reports are critical to FNS's

ability to evaluate and monitor demonstration projects. Additionally, if this collection was not conducted or was conducted less frequently, FNS would be less equipped to comply with applicable cost neutrality requirements.

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

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

**Collection of Race/Ethnicity Data**

FNS does not collect race and/or ethnicity data in this activity.

**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.**

FNS published a 60-day notice in the Federal Register on April 8, 2024. FNS received three comments. One comment (Appendix M) was not germane to the content in this information collection. Another comment, from the California Department of Social Services (CDSS) (Appendix K), is not relevant since this collection now omits the component CDSS was addressing.

The final comment, from the Center for Science in the Public Interest (CSPI) (Appendix L), regarded the demonstration project portion of the information collection. This comment encouraged FNS to be transparent about the demonstration project approval process, including



timelines for approval or denial, identifying which agency within USDA handles demonstration project requests, determining what information needs to be included in the request, the required components for the project evaluation, and the process for submitting and receiving feedback from USDA about the request, and a lack of clarity around USDA's timeline for reviewing the request.

FNS is committed to transparency with its State partners and the general public when feasible, but has historically focused efforts on improving the State experience. For instance, FNS provides support to State agencies via the SNAP Waiver Information Management System (WIMS) in the form of guidance, training, and technical assistance. WIMS facilitates the request and response process between State agencies and FNS, allows State agencies and FNS to communicate critical information about specific waivers in a central location, and contains a virtual library which holds all the demonstration project request templates (e.g., initial, modification and extension), data report templates, and guidance documents, which State agencies use to request projects and submit data reports. Information about demonstration projects is also available in public documents, such as the State Options Report and on the USDA website. The comment also encouraged FNS to explore offering grant opportunities to support novel demonstration projects. FNS is unable to explore offering grant opportunities to support demonstration projects without Congressional approval and appropriations.

**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 consulted with State SNAP agencies in Massachusetts, Arizona, Illinois, and Michigan to determine the amount of time State agency staff spend initiating a demonstration project, fulfilling operational requirements, and requesting project renewals.

**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. This information collection request has been reviewed and cleared by FNS Privacy Officer, Deea Coleman, on 8/27/2024.

**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.**

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.**

To estimate burden for demonstration project requirements, FNS consulted with four State agencies to estimate the time State agency staff spent initiating a demonstration project, fulfilling operational requirements, and requesting project renewals. Based on this consultation, FNS estimates it would take approximately 1,105 hours for State agency staff to initiate a demonstration project, approximately 24 hours to prepare and submit a modification and/or extension request, and approximately 81 hours to prepare and submit required data reports. After consulting with internal stakeholders, FNS changed the way it represents the estimated annual burden to SNAP State agencies from that in the 60-Day notice associated with this ICR. FNS estimates that 10 SNAP State agencies would initiate a demonstration project, 39 SNAP State agencies would submit a modification and/or extension request, and 39 SNAP State agencies would submit a data report each year. The annual estimate for State agency demonstration project reporting is approximately 16,633 hours.

States complete demonstration project data reports using a combination of caseload-level data, SNAP Quality Control (QC) case review data, and additional case reviews, when there are too few demonstration project cases in the QC review sample to meet the demonstration project

evaluation requirements. Therefore, the burden of demonstration project requirements for individual households is the burden of the additional case reviews in which SNAP households would have to participate.

In the 60-Day notice associated with this ICR, FNS erroneously did not include the burden on individual households associated with providing data for cost neutrality reports when estimating the costs of this information collection. States use the Quality Control (QC) review process to conduct reviews of supplemental cases to collect the data required for cost neutrality reports. To calculate the burden on individual households, FNS used 2022 data on the number of supplemental case reviews States with either an SMD or CAP needed to meet 200 minimum sample size for all cost neutrality reports. FNS estimates that 6,277 additional households would be subject to the QC review process for States to meet the minimum sample size for cost neutrality reports than would be expected under normal SNAP rules. These households are randomly selected from the universe of SMD or CAP participants needed to meet the minimum sample size for cost neutrality reports. Using historical data from OMB Control Number 0584-0074 (expiration 7/31/2025), FNS estimated it would take approximately one half-hour for a household to complete the QC review process. The annual estimate for household reporting is 3,139 hours.

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understood that the evaluation component of demonstration projects makes them subject to separate IC requirements. FNS acted quickly to submit a 60-Day Notice and subsequent information collection. This information collection seeks to come into compliance with the Paperwork Reduction Act (PRA) for demonstration projects.

Respondent Category	Type of Respondent	Burden Activity	Estimated Number of Respondents	Responses per Respondent	Total Annual Responses	Estimated Hours Per Response	Estimated Total Burden Hours	Base Hourly Wage Rate (See BLS)	Fully-Loaded Wage Rate	Total Annualized Cost of Respondent Burden	Burden Hours in Use without a Valid OMB Control Number	Previously Approved Burden Hours	Difference Due to Adjustments	Differences Due to Program Changes
Reporting														
Households														
Individuals / Households	SNAP Households	Number of supplemental cases needed to meet 200 minimum sample size for all cost neutrality reports **	6277	1	6277	0.5000	3138.5000	\$7.25	\$7.25	\$22,754.13	3138.5000	0	3138.5000	0
Subtotal Individuals/Households			6277	1	6277	0.5000	3138.5000	\$7.25	\$7.25	\$22,754.13	3138.5	0	3138.5	0
State Agencies														
State Government	SNAP State Agencies	Preparing and submitting a new demonstration project request	10	1	10	1105.2308	11052.3080	\$23.22	\$30.88	\$341,324.01	11052.308	0	11052.308	0
State Government	SNAP State Agencies	Preparing and submitting modifications and extensions	39	0.4410	17.199	24.3000	417.9357	\$23.22	\$30.88	\$12,906.94	417.9357	0	417.9357	0
State Government	SNAP State Agencies	Preparing and submitting data reports.	39	1.5921	62.0921	81.4375	5056.6258	\$23.22	\$30.88	\$156,161.75	5056.62582	0	5056.62582	0
Subtotal State Agencies			53	1.6847	89.2911	185.0898	16526.8695	\$23.22	\$30.88	\$510,392.70	16526.86952	0	16526.86952	0
Grand Total Households + State Agencies			6330	1.0057	6366.2911	3.0890	19665.3695			\$533,146.83	19665.36952	0	19665.36952	0

**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 is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2023 National Occupational and Wage Statistics, Occupational Group (43-4061 Eligibility Interviewers, Government Programs) ([http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)). The hourly mean wage for functions performed by a State agency eligibility worker is estimated at \$23.22 per staff hour for each associated burden activity. The overall estimated cost to the respondent for the data collection with fully loaded wages for State agencies is \$536,420.38, which includes fringe benefits. FNS adds 33 percent to the State agency's overall respondent cost to account for the fringe benefits. The estimated annualized, fully loaded cost to respondents after 50 percent reimbursement from the Federal government is \$268,210.19. In addition, the cost to households is based on the U.S. federal minimum wage of \$7.25 per hour. Based on this rate, the total estimated burden cost to households is \$22,754.13 for reporting. The estimate for household reporting cost was estimated by using the U.S. Department of Labor's most recent Federal minimum wage found at <https://www.dol.gov/agencies/whd/minimum-wage>. 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.**

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.**

The annual respondent cost for demonstration projects is \$284,560.80. FNS estimates that one SNAP program analyst, GS grade 13 step 1 (\$42.41/hour) will take approximately two hours to analyze the cost neutrality data reports received from this information collection, totaling \$1,472.67. FNS estimates that one SNAP program analyst, GS grade 13 step 1 (\$42.41/hour) will take approximately two hours to review all the data reports received from this information collection, totaling \$6,573.14. FNS estimates that one SNAP program analyst, GS grade 13 step 1 (\$42.41/hour) will take approximately six hours to review initial demonstration project requests received from this information collection, totaling \$3,232.70. FNS estimates that one SNAP program analyst, GS grade 13 step 1 (\$42.41/hour) will take approximately six hours to review initial demonstration project requests received from this information collection, totaling \$3,232.70. FNS estimates that one SNAP Branch Chief, GS grade 14 step 1 (\$50.12/hour) will take approximately two hours to review initial demonstration project requests received from this information collection, totaling \$1,273.34. FNS estimates that one SNAP program analyst, GS grade 13 step 1 (\$42.41/hour) will take approximately two hours to review modification and extension requests received from this information collection, totaling \$1,853.31. FNS estimates that one SNAP Branch Chief, GS grade 14 step 1 (\$50.12/hour) will take approximately one hour to review modification and extension requests received from this information collection, totaling \$1,095.01. The Federal share of State reimbursable costs is \$268,210.19.





Estimates of Annualized Cost to Federal Government									
Activities	Hours Spent on Collection	Number of Collections	Costs or Hourly Wage Rate	Total Cost	Fringe Benefits Cost for Staff (0.33)	Overall Cost w/ Fringe Benefits for Staff	Burden Hours in Use without a Valid OMB Control Number	Previously Approved Burden Hours	Difference Due to Adjustments
50% Reimbursement Cost to States for reporting administrative cost	N/A	N/A	N/A	N/A	N/A	\$268,210.19	N/A	0	N/A
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for analyzing data reports	2	13.6667	\$42.41	\$1,159.21	\$382.54	\$1,541.74	2	0	2
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for reviewing data reports	2	62.0921	\$42.41	\$5,266.65	\$1,738.00	\$7,004.65	2	0	2
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for reviewing new demonstration project requests	6	10	\$42.41	\$2,544.60	\$839.72	\$3,384.32	6	0	6
Branch Chief GS 14 Step 1 Estimates of Annualized Cost to Federal Government for reviewing new demonstration project requests	2	10	\$50.12	\$1,002.40	\$330.79	\$1,333.19	2	0	2
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for reviewing modification and extension requests	2	17.199	\$42.41	\$1,458.82	\$481.41	\$1,940.23	2	0	2
Branch Chief GS 14 Step 1 Estimates of Annualized Cost to Federal Government for reviewing modification and extension requests	1	17.199	\$50.12	\$862.01	\$284.46	\$1,146.48	1	0	1
Sub Total Cost to Government of Demonstration Projects	15	89.2911	\$44.98	\$12,293.69	\$4,056.92	\$284,560.80	15	0	15
Grand Total Cost to Federal Government	15	89.2911	\$44.98	\$12,293.69	\$4,056.92	\$284,560.80	15	0	15
Estimates of Annualized Cost to Federal Government									

Activities	Hours Spent on Collection	Number of Collections	Costs or Hourly Wage Rate	Total Cost	Fringe Benefits Cost for Staff (0.33)	Overall Cost w/ Fringe Benefits for Staff	Burden Hours in Use without a Valid OMB Control Number	Previously Approved Burden Hours	Difference Due to Adjustments	Differences Due to Program Changes
50% Reimbursement Cost to States for reporting administrative cost	N/A	N/A	N/A	N/A	N/A	\$268,210.19	N/A	0	N/A	0
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for analyzing data reports	2	13.6667	\$42.41	\$1,159.21	\$382.54	\$1,541.74	2	0	2	0
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for reviewing data reports	2	62.0921	\$42.41	\$5,266.65	\$1,738.00	\$7,004.65	2	0	2	0
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for reviewing new demonstration project requests	6	10	\$42.41	\$2,544.60	\$839.72	\$3,384.32	6	0	6	0
Branch Chief GS 14 Step 1 Estimates of Annualized Cost to Federal Government for reviewing new demonstration project requests	2	10	\$50.12	\$1,002.40	\$330.79	\$1,333.19	2	0	2	0
Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for reviewing modification and extension requests	2	17.199	\$42.41	\$1,458.82	\$481.41	\$1,940.23	2	0	2	0
Branch Chief GS 14 Step 1 Estimates of Annualized Cost to Federal Government for reviewing modification and extension requests	1	17.199	\$50.12	\$862.01	\$284.46	\$1,146.48	1	0	1	0
<b>Sub Total Cost to Government of Demonstration Projects</b>	<b>15</b>	<b>89.2911</b>	<b>\$44.98</b>	<b>\$12,293.69</b>	<b>\$4,056.92</b>	<b>\$284,560.80</b>	<b>15</b>	<b>0</b>	<b>15</b>	<b>0</b>
<b>Grand Total Cost to Federal Government</b>	<b>15</b>	<b>89.2911</b>	<b>\$44.98</b>	<b>\$12,293.69</b>	<b>\$4,056.92</b>	<b>\$284,560.80</b>	<b>15</b>	<b>0</b>	<b>15</b>	<b>0</b>

**A15. Explanation of program changes or adjustments.**

This submission is a new information collection request will add approximately 6,366 responses and 19,665 hours of burden to OMB's inventory. All of these hours have been collected for demonstration projects without an OMB control number. FNS has considered demonstration projects to be part of the waiver process covered under OMB Control Number 0584-0083 (expiration 9/30/2026). However, after reevaluation, FNS understood that the evaluation component of demonstration projects makes them subject to separate IC requirements. FNS acted quickly to submit a 60-Day Notice and subsequent information collection. This information collection seeks to come into compliance with the Paperwork Reduction Act (PRA) for demonstration projects.

**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.