

## Appendix E: Estimates of the Hour Burden of the Collection of Information – Narrative

### *Supplemental Nutrition Assistance Program (SNAP): Reporting of Lottery & Gambling, and*

#### *Resource Verification*

(OMB Control Number 0584-0621)

### **Reporting Requirements**

#### **Lottery & Gambling**

For this information collection, the Agency assumes that 49 (out of 53 total) State SNAP agencies have lottery and gambling entities in their State. Therefore, these State SNAP agencies and the individuals they serve are likely to incur burden related to the lottery and gambling requirements. The States each have cooperative agreements with public and private gaming entities and each of these gaming entities input data on winning individuals into the existing matching system. State SNAP agencies then use this matching system to identify potential winners and take the appropriate follow-up action(s). SNAP households must also report substantial lottery winnings.

#### ***Individuals/Households Burden Requirements***

7 CFR 273.11(r). SNAP individuals/households must report substantial lottery or gambling winnings to their State SNAP Agency. FNS estimates that approximately 90 households per State will have substantial winnings that they must report. It will take the 4,410 affected households approximately 10 minutes (.167 hours) to report changes for a total annual burden of 736.47 burden hours. **When compared to the previous information collection, the total burden hours for household reporting for the lottery and gambling provisions has decreased by 15.03 hours from 751.50 hours due to an adjustment made to the estimates of this collection to improve accuracy.**

#### ***State Agency Burden Requirements***

7 CFR 272.17 and 7 CFR 273.11(r). The State agencies affected by this collection perform data matches as frequently as is feasibly possible to identify SNAP recipients with substantial winnings. FNS estimates that each of the 49 SNAP State agencies will have 140 matches with misidentified participants annually (misidentifications could occur because of a similar name, inaccurate reporting, etc.). It will take State SNAP eligibility workers approximately 40 minutes (.668 hours) to identify each misidentification for a total annual burden of 4,582.48 burden hours. **When compared to the previous information collection, the total burden hours related to processing misidentifications has decreased by 93.52 hours to 4,676 hours due to an adjustment made to the estimates of this collection to improve accuracy.**

7 CFR 272.17 and 7 CFR 273.11(r). For the 22,540 total annual matches found to have actual,

substantial winnings (“substantive matches”), State SNAP eligibility workers will generate a request for contact (RFC) requesting more information from the household. The burden associated with RFCs is already accounted for in OMB Control Number 0584-0064 (expiration 6/30/2027), specifically related to 7 CFR 273.12(c), and is not counted in the total burden for this information collection.

FNS estimates that approximately 80 percent of participants will return the RFCs. This estimate is based on a prior estimate in OMB Control Number 0584-0064 (6/30/2027) regarding RFCs. State SNAP eligibility workers will spend approximately 20 minutes (.334 hours) reviewing the returned information. Therefore, FNS estimates that eligibility workers will handle approximately 368 returned RFCs per State (18,032 total) for a total annual burden of 6,022.69 burden hours. **When compared to the previous information collection, the total burden hours related to States processing cases for all substantial lottery winners has decreased from 6,146 burden hours to 6,022.69 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

The burdens related to closing cases and sending notices of adverse action for households who either did not return the RFC or were substantial lottery winners is accounted for in OMB Control Number 0584-0064 (expiration 6/30/2027), specifically related to 7 CFR 273.13(a), and is not counted in the total burden of this collection.

7 CFR 272.17 and 7 CFR 273.11(r). For the 4,410 SNAP households (90 per State agency) that self-report substantial lottery winnings outside of the matching system, State SNAP eligibility workers will take 11 minutes (.184 hours) to review the information for a total annual burden of 810.12 burden hours. If the worker finds the household to be a substantial winner, the worker closes the case and sends a notice of adverse action. The burden associated with notices of adverse action (7 CFR 273.13(a)) is accounted for in OMB Control Number 0584-0064 (expiration 6/30/2027) and is not counted in the total burden of this collection.

**When compared to the previous information collection, the total burden hours related to States processing cases for all substantial lottery winners has decreased from 826.65 burden hours to 810.12 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

7 CFR 272.17(c). State public agency gaming entities enter information into the matching system for every individual who wins over the threshold for substantial winnings. FNS estimates that each public agency gaming entities (1 per State, 49 total) would have 6,000 individuals who win over the threshold in a given year for a total of 294,000 annual responses, and it will take approximately 5 minutes (0.0835 hours) for the State public agency gaming entity to identify the winner and enter the appropriate information into the matching system, for a total of 23,520 annual burden hours per year. **When compared to the previous information collection, the total burden hours related to State public agency gaming entities entering information into the matching system for every individual who wins over the threshold for substantial winnings has increased from 24,000 burden hours to 24,549 burden hours.**

7 CFR 272.17(c). Each of the 49 State SNAP agencies maintain a computerized data matching system with State public agency and private gaming entities. FNS estimates that this will take one State SNAP IT staff approximately 320 hours per State, for a total of 15,680 hours per year. **When compared to the previous information collection, the total burden hours related to State SNAP agencies maintaining a computerized data matching system with State public agency and private gaming entities has decreased from 16,000 burden hours to 15,680 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

### ***Private Business Burden Requirements***

7 CFR 272.17(c). 196 private gaming entities (an estimated 4 per State) enter information into the computerized system for every individual who wins over the threshold for substantial winnings. FNS estimates it will take approximately 5 minutes (0.0835 hours) for the private business gaming agency to identify each of the 6,000 winners per entity and enter the appropriate information into the matching system for a total of 98,196 annual burden hours per year. **When compared to the previous information collection, the total burden hours related to private gaming entities entering information into the computerized system for every individual who wins over the threshold for substantial winnings has increased from 96,000 burden hours to 98,196 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

### **Resource Verification**

State agency and household/individual burden for this section of the information collection depends on if and how States elect to verify resources for households that are not categorically eligible for SNAP. 7 total SNAP State agencies verify resources; of these, 3 States verify resources when reported resources are close to the limit or questionable (“High Limit” States), 2 verify only when the report is questionable (“Self-Attestation” States), and 2 always verify resources (“Always” States).

### ***Individuals/Household Burden Requirements<sup>1</sup>***

7 CFR 273.2(f)(1) & (2). An estimated 1,199,033 households are required to provide verification of their resources as part of the initial SNAP application process. FNS estimates that providing this resource verification takes approximately 4 minutes (.0668 hours) per household for a total of 80,095.43 burden hours annually. **When compared to the previous information collection, the total burden hours related to households who are required to provide verification of their resources as part of the initial SNAP application process has increased from 71,646.21**

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<sup>1</sup> The estimate for the number of households subject to resource verification activities is based on National Data Bank data from FY 2024, FNS 366-B, Initial Applications Approved and Recertification Applications Approved. OMB Control Number 0584-0594 (expiration 9/30/2026).

**burden hours to 80,095.43 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

7 CFR 273.2(f)(8)(i). An estimated 674,934 households are required to provide verification of their resources during their application process to recertify their SNAP case. FNS estimates that providing this verification takes approximately 6 minutes (.1002 hours) per household for a total of 67,628.42 burden hours per year. **When compared to the previous information collection, the total burden hours related to households who are required to provide verification of their resources as part of the SNAP application recertification process has decreased from 76,707.108 burden hours to 67,628.42 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

### ***State Agency Burden Requirements***

#### ***“High Limit” States***

7 CFR(f)(1) & (2). FNS estimates that State SNAP agency eligibility workers in 3 States spend 33.15 minutes (0.554 hours) per each initial application case (217,720.76 cases per State) to verify resources for a total of 139,776.73 annual burden hours. **When compared to the previous information collection, the total burden hours related to State SNAP agency eligibility workers in “High Limit” States to verify household resources for initial SNAP application cases has increased from 122,151.30 burden hours to 139,776.73 burden hours due to an increase made to the estimates of the burden hours per response based on State feedback.**

7 CFR(f)(8)(i). FNS estimates that State SNAP agency eligibility workers in 3 States spend 33.2 minutes (0.550 hours) per each recertification case (65,316.23 cases per State) to verify resources for a total of 107,771.78 burden hours per year. **When compared to the previous information collection, the total burden hours related to State SNAP agency eligibility workers in “High Limit” States to verify household resources for SNAP recertification application cases has increased from 52,311.90 burden hours to 107,771.78 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

#### ***“Self-Attestation” States***

7 CFR(f)(1) & (2). FNS estimates that State SNAP agency eligibility workers in 2 States spend 12.4 minutes (.201 hours) per each initial application case (38,678.5 cases per State) to verify resources for a total of 15,548.76 annual burden hours. **When compared to the previous information collection, the total burden hours related to State SNAP agency eligibility workers in “Self-Attestation” States to verify household resources for initial SNAP application cases has decreased from 48,860.52 burden hours to 15,548.76 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

7 CFR(f)(8)(i). FNS estimates that State SNAP agency eligibility workers in 2 States spend 8.8 minutes (0.135 hours) per each recertification case (21,772.08 cases per State) to verify resources

for a total of 5,878.46burden hours per year. **When compared to the previous information collection, the total burden hours related to State SNAP agency eligibility workers in “Self-Attestation” States to verify household resources for SNAP recertification application cases has increased from 20,924.76 burden hours to 5,878.46 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

*“Always” States*

7 CFR(f)(1) & (2). FNS estimates that State SNAP agency eligibility workers in 2 States spend 32.5 minutes (.534 hours) per each initial application case (386,784.96 cases per State) to verify resources for a total of 413,086.34annual burden hours. **When compared to the previous information collection, the total burden hours related to State SNAP agency eligibility workers in “Always” States to verify household resources for initial SNAP application cases has increased from 173,752.78 burden hours to 413,086.34burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

7 CFR(f)(8)(i). FNS estimates that State SNAP agency eligibility workers in 2 States spend 19.16 minutes (.321 hours) per each recertification case (65,316.23cases per State) to verify resources for a total of 107,771.78burden hours per year. **When compared to the previous information collection, the total burden hours related to State SNAP agency eligibility workers in “Always” States to verify household resources for SNAP recertification application cases has increased from 74,512.56 burden hours to 107,771.78 burden hours due to an adjustment made to the estimates of this collection to improve accuracy.**

**Recordkeeping Requirements**

There is no recordkeeping burden for this information collection.