SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0446

Supplemental Nutrition Assistance Program

Repayment Demand and Program Disqualification

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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. 5
A4. EFFORTS TO IDENTIFY DUPLICATION. 6
A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES. 7
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY. 7
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5. 8
A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION. 8
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS. 9
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS. 10
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE. 11
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. 11
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN. 18
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. 18
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS. 20
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE. 20
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE. 21
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19. 21

Appendices

Appendix A: Legal Authority 7 CFR 273.18
Appendix B: Screenshot - FPRS Homepage
Appendix D: Burden Table
Appendix E: TOP Handbook
Appendix F: Certification Memo to States
Appendix G: Screenshot - Claims against Households

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 statement supports the request to reinstate an expired information collection for an information collection related to collection methods for delinquent Supplemental Nutrition Assistance Program (SNAP) recipient claims. FNA is still legally required to collect this data and is thereby continuing to collect in violation of the Paperwork Reduction Act. The revision of burden hours is a result of updated estimates from State agencies. Section 13(b) of the Food and Nutrition Act of 2008 (the Act)[1], as amended (7 U.S.C. 2022(b)), and SNAP regulations at 7 CFR 273.18[2] (Appendix A) require State agencies to refer all delinquent SNAP debts to another Federal government entity as third-party disclosure reporting to U.S. Department of the Treasury (Treasury) for collection. The Debt Collection Improvement Act of 1996[3] (DCIA) (P.L. 104-134), as amended by the Digital Accountability and Transparency Act of 2014[4] (P.L. 113-101), requires that these debts be referred to Treasury for collection when they are 120 days or more delinquent. The Treasury Offset Program (TOP), 31 CFR Part 285[5], intercepts and offsets payments such as Federal income tax refunds and Federal salaries and applies the offset to the delinquent debt. The amount or percentage that can be offset from any payment type is set by

[1] https://www.govinfo.gov/content/pkg/COMPS-10331/pdf/COMPS-10331.pdf
[2] https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-F/section-273.18
[3] https://www.govinfo.gov/content/pkg/FR-1996-10-21/pdf/96-26495.pdf
[4] https://www.congress.gov/113/plaws/publ101/PLAW-113publ101.pdf
[5] https://www.ecfr.gov/current/title-31/subtitle-B/chapter-II/subchapter-A/part-285

law or regulation[6]. The requirement to use TOP to collect delinquent debts places a reporting, recordkeeping, and public disclosure burden on State agencies, debtors, or automated data processing (ADP) and third-party support solutions.

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.

The information is used to satisfy the requirements at Section 13(b) of the Act[7], as amended (7 U.S.C. 2022(b)), and SNAP regulations at 7 CFR 273.18, which requires State agencies to refer delinquent SNAP debts to Treasury for collection and notify debtors.

SNAP regulations at 7 CFR 273.18[8] require that State agencies establish, collect, and efficiently manage SNAP recipient claims within 120 days. Text at 7 CFR 273.18(n)(1)[9] states that State agencies must submit debts to TOP when they are 180 days delinquent or more. However, DCIA updated this timeframe to require that eligible delinquent debts be referred to TOP within 120 days. While SNAP regulations have not yet been updated to reflect this change, States must comply with the 120-day timeframe. State agencies must submit files containing these delinquent debts to FNA weekly, which FNA then consolidates into one file and sends to Treasury each week.

[6] https://fiscal.treasury.gov/top/legal-authorities-quick-reference.html
[7] https://www.govinfo.gov/content/pkg/COMPS-10331/pdf/COMPS-10331.pdf
[8] https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-F/section-273.18
[9] https://www.ecfr.gov/current/title-7/part-273/section-273.18#p-273.18(n)(1)

The information collected under this request is used to assist:

(1) State agencies to identify eligible debts to send to TOP, request addresses for TOP notices, send TOP notices to debtors, and give due process,

(2) FNA to forward files to Treasury for action and to provide Federal-level due process, and to ensure that collections are received and applied to the appropriate debt,

(3) Treasury to intercept Federal payments and offset debts, and

(4) Debtors to receive, read, and respond to TOP notices.

A3. Use of information technology and burden reduction.

A3.1 - 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.

FNA is required to comply with the E-Government Act of 2002[10]. State agencies have the authority to use information technology that best suits the needs of their systems of operations to comply with this information collection. Nearly every State agency employs an automated system to maintain recipient claims activity and the referral and maintenance of debts subject to TOP.

A3.2 - Burden Reduction:

[10] https://www.govinfo.gov/content/pkg/PLAW-107publ347/pdf/PLAW-107publ347.pdf

State agencies use ADP or third-party support solutions extensively for the collection methods. Electronic data transmission between State agency systems, Treasury system, and from the mainframe is used to minimize State agency and Federal resources needed for TOP collection.

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 are no similar data collection efforts available. Every effort has been made to avoid duplication. FNA has reviewed U.S. Department of Agriculture (USDA) reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNA solely monitors Federal Collection Methods for SNAP Recipient Claims for SNAP benefits to ensure and protect program integrity. The information required by 7 CFR 273.18[11], 7 CFR 273.18(n)[12], and the FNA-209 form is only reported to FNA.

The burden associated with establishing claims (demand letters which are sent to debtors' home addresses) and for reporting activity with the FNA-209 form (Appendix B) are already approved under the Office of Management and Budget (OMB) burden numbers 0584-0492, expiration date 08/31/2027 and 0584-0594[13] (Appendix B), expiration date 09/30/2026, respectively, and therefore not duplicated in this request.

[11] https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-F/section-273.18
[12] https://www.ecfr.gov/current/title-7/part-273/section-273.18#p-273.18(n)
[13] https://www.govinfo.gov/content/pkg/FR-2022-01-04/pdf/2021-28398.pdf#page=11

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 a mandatory and ongoing information collection. This information is collected for the purpose of administering an ongoing program. Collecting this information less frequently would not allow FNA to comply with DCIA requirements. The TOP information associated with due process is collected once per delinquent debt when it is determined that the debt is to be referred to TOP. Without this collection, FNA could not fulfill due process and other legal requirements or adequately inform debtors of impending actions. Additionally, Treasury requires that debts be maintained while in TOP to avoid negatively impacting the Program or debtors by over- or under-collecting on debts.

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.**

State agencies are required to adhere to Treasury weekly reporting requirements for debts in TOP. There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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

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

The 60-day Federal Register Notice was published on April 8, 2026. (91 FR 17784). Comments were solicited on this information collection as part of the comment period of the notice. No comments were received.

Consultation with State agencies regarding the Federal collection of SNAP claims is a continuous process. For the burden estimates for this information collection renewal, FNA contacted State agency officials who work closely with TOP to collect delinquent SNAP claims in several States, including:

1) Aeriel (Missouri Department of Social Services)
2) Gerrah (Illinois Department of Human Services)
3) Ammie (Michigan Department of Health and Human Services).

FNA sent the contacts the Federal Register Notice and asked for feedback related to the frequency of collection, the clarity of instructions and recordkeeping, disclosure, and the data elements to be recorded, disclosed, or reported. FNA adjusted burden times by averaging the estimates provided.

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.

Section 11 (e)(8) of the Act and implementing regulations at 7 CFR 272.1[14] limit the use or disclosure of information obtained from applicant households to persons directly connected with either the administration or safeguarding the integrity of SNAP. Additionally, the safeguard provision in IRS Publication 1075[15] and the Privacy Act of 1974[16] apply to information used in the TOP process. The information provided will be kept private and will not be disclosed to anyone, but the staff involved in this process, except as otherwise required by law. This information collection request was cleared by Deea Coleman, FNA Privacy Officer on 01/05/2026.

The TOP notice sent to debtors contains personally identifiable information (PII) [17]. Therefore, the Privacy Act Statement will be displayed on any FNA or State designed forms or templates for the respondent's review. State agency forms (e.g., applications) collect debtors' PII that is used to populate TOP notices. These forms are included under OMB burden number 0584-0064, expiration date 06/30/2027.

[14] https://www.ecfr.gov/current/title-7/section-272.1
[15] https://www.irs.gov/pub/irs-pdf/p1075.pdf
[16] https://www.govinfo.gov/content/pkg/USCODE-2018-title5/pdf/USCODE-2018-title5-partI-chap5-subchapII-sec552a.pdf
[17] FNS' template for State agencies to use for TOP notices includes the debtor's name, address and SNAP case number.

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.**

For this information collection, we are using the TOP referral data from the prior submission (calendar years 2018-2020) due to an abnormal decrease in SNAP TOP debt referrals during the COVID-19 Public Health Emergency (PHE) to redetermine burden hours. During the PHE, State agencies were provided the flexibility to suspend collection of active recoupments of SNAP overpayments, delay collection on newly established overpayments, and not consider any payments delayed due to this suspension to be delinquent. Additionally, State agencies were given the flexibility to suspend TOP collections.

We anticipate the burden estimate data will return to a more expected range with the next

submission, as the COVID-19 PHE and related claims waiver flexibilities have ended. For this ICR we used the data from the prior submission for total numbers of responses and respondents, but we have updated the estimated burden hours per response based on feedback from State agencies.

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 Burden Table below (Appendix D).

SECTION OF REG	DESCRIPTION	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	BASE HOURLY WAGE RATE	FULLY LOADED WAGE RATE	TOTAL ANNUALIZED COST OF RESPONDENT BURDEN
Households (Debtors)									
A. Due-Process Notice Requirements									
273.18(n)(2)	Reading State Issued Notice	249,953	1.00	249,953	0.0835	20,871.10	$7.25	$7.25	$ 151,315.50
	Informal Inquiries to State	17,497	1.00	17,497	0.2500	4,374.19	$7.25	$7.25	$ 31,712.87
	Formal Appeals to State	1,499	1.00	1,499	0.5000	749.29	$7.25	$7.25	$ 5,432.34
	Reading FNA issued letter to Federal employees	2,458	1.00	2,458	0.0835	205.28	$7.25	$7.25	$ 1,488.25
	Phone Inquiries and informal	738	1.00	738	0.2500	184.38	$7.25	$7.25	$ 1,336.75

	appeals for FNA letter								
	Formal appeals to FNA	16	1.00	16	0.5000	8.19	$7.25	$7.25	$ 59.41
Household Total		**272,161**	**1.00**	**272,161**	**0.0970**	**26,392.43**	**$7.25**	**$ 7.25**	**$ 191,345.12**
State Agencies									
A. Due-Process Notice Requirements									
273.18(n)(2)	State Notice Production	53	4,716.10	249,953	0.0167	4,174.22	$ 12.98	$ 17.26	$ 72,061.24
	Responding to State Phone/informal Inquires	53	330.13	17,497	0.2500	4,374.19	$ 12.98	$ 17.26	$ 75,513.37
	Responding to State Formal Appeals	53	28.28	1,499	0.5000	749.29	$ 12.98	$ 17.26	$ 12,935.27
	Providing documents for formal appeals to FNA	53	0.31	16	0.5000	8.19	$12.98	$ 17.26	$ 141.47
B. State Agency Reporting									
273.18(n)(1)(ii)	State's Annual Certification Letter FNA	53	1.00	53	0.5000	26.50	$ 12.98	$ 17.26	$ 457.48
State Agency Total		**53**	**5,075.81**	**269,018**	**0.03**	**9,332.39**	$ 12.98	**$ 17.26**	**$ 161,108.82**
C. TOP Automated Data Processing/Third Party Support Solutions									
273.18(n)(1) 273.18(n)(4)	System Compatibility File	53	1.00	53	10.3750	549.88	$12.98	$ 17.26	$ 9,492.71
	Address File	53	8.00	424	1.3650	578.76	$12.98	$ 17.26	$ 9,991.37
	Collections File	53	8.00	424	5.2812	2,239.23	$ 12.98	$ 17.26	$ 38,656.70
	State Agency Profile	53	1.00	53	0.2500	13.25	$ 12.98	$ 17.26	$ 228.74
	Testing New	5	1.00	5	7.0000	35.00	$ 12.98	$ 17.26	$ 604.22

	System								
	Weekly Files	53	52.00	2,756	1.2222	3,368.38	$ 12.98	$ 17.26	$ 58,149.75
	Weekly Files - Post TOP Data	53	52.00	2,756	1.4444	3,980.77	$ 12.98	$ 17.26	$ 68,721.56
Automated Data Processing/Third Party Support Solutions Total		**53**	**122**	**6,471**	**1.6636**	**10,765.26**	**$ 12.98**	**$ 17.26**	**$ 185,845.05**
Overall Totals		**53**	**5,198.91**	**547,650**	**0.0849**	**46,490.09**			**$ 538,298.99**

RECORDKEEPING							
NO. OF RECORD KEEPERS	**NO. OF RECORDS ANNUALLY PER RECORD KEEPER**	**TOTAL OF ALL RECORDS ANNUALLY**	**HOURS PER RECORD**	**TOTAL RECORD KEEPING HOURS**	**BASE HOURLY WAGE RATE**	**FULLY LOADED WAGE RATE**	**TOTAL ANNUALIZED COST OF RESPONDENT BURDEN**
53	**52**	**2,756**	**0.25**	**689.00**	**$ 12.98**	**$ 17.26**	**$ 11,894.48**

The total burden for this collection is 47,179.09 hours (debtors 26,392.43 + State agency reporting 9,332.39 + ADP or third-party support solution reporting 10,765.26 + State agency recordkeeping 689 = 47,179.09). The total number of burden hours has decreased by 1,609.55 hours (48,788.64 (FY23) – 47,179.09 (FY26) = 920.55 hours), due to updated time estimates received during stakeholder consultations. The total number of affected public is 272,214 (debtors 272,161 + 53 State agencies). In many instances, each of the 272,161 debtors may be contacted more than once; however, only the initial contact with the same debtor is counted

towards the total number of respondents. The total number of respondents has remained the same as we are using data from the last submission. The total burden for each group and their activities are broken down below.

We estimate that State agencies will produce and send, and that debtors will read, 249,953 TOP notices based on the average number of claims that States sent to TOP for calendar years 2018, 2019, and 2020. We also estimate that debtors will submit, and State agencies will respond to about 17,497 phone and informal inquiries. Debtors will file and State agencies will respond to an estimated 1,499 appeals. FNA will send 2,458 notices to Federal employees concerning the potential offset of their Federal salary. Based on the data from calendar years 2018-2020, 30 percent of these notices, 738, will result in a phone inquiry from a debtor, and approximately 16 notices will result in a formal appeal to FNA and require documentation from the State agency to process the appeal. Thus, the total number of responses for the TOP notice and debtor inquiries is 547,650 (272,161 debtor responses + 275,489 State agency responses) per year resulting in an annual reporting burden of 46,490.09 hours. While we have used the same TOP referral data from the prior submission, we updated the burden hours for individual activities through new stakeholder consultations with State agencies. These stakeholder consultations resulted in a total burden decreased by 1,609.55 hours, from 48,099,64 hours to 46,490.09 hours.

Treasury prescribes specific processes and file formats for FNA to use to send debts to TOP. FNA provides guidance and file formats (Appendix E) to State agencies and monitors their

compliance with these processes. State agencies must submit an annual letter to FNA (Appendix F) certifying that all the debts submitted in the past to TOP and all debts to be submitted in the upcoming calendar year to TOP are valid and legally enforceable in the amount stated. FNA estimates that it will take State agencies a total of 26.5 hours per year for these State submissions. The burden requirements associated with establishing claims (demand letters) and for reporting activity with the FNA–209 form (648 burden hours and 212 total annual responses) is already approved under the information collections for SNAP Repayment Demand and Program Disqualification (OMB burden numbers 0584–0492, expiration date 08/31/2027; and 0584–0594, expiration date 09/30/ 2026) and therefore, not duplicated. The State agency reporting burden has not changed with this revision.

The burden for ADP or third-party support solutions includes weekly file processing, monthly address requests, and system maintenance. Weekly and monthly file processing includes requesting addresses to send out TOP notices, adding and maintaining debts in TOP, correcting errors on records that were unable to be processed, and posting weekly collection files. Much of this activity is completed using automation and involves an estimated 1.4 million records annually. FNA estimates that this activity takes 10,765.26 annual reporting hours. Per CFR 272.1(f)[18], State agencies are required to retain all records associated with the administration of SNAP for no less than 3 years. The burden for the retention of weekly TOP files is estimated to take each of the 53 State agencies approximately 0.25 hours per week, or 689 recordkeeping burden hours. These ADP or third-party support solution burden estimates have decreased by

[18] https://www.ecfr.gov/current/title-7/part-272/section-272.1#p-272.1(f)

1,609.55, from 12,374.82 hours to 10,765.26 hours. This decrease is a result of updated average time estimates from stakeholders.

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

The SNAP information collection requirements described herein are imposed primarily on State agency eligibility workers. Standard wage rate categories used in determining annualized burden costs are based on the Bureau of Labor and Statistics (BLS) May 2024 Occupational Employment and Wages Statistics report, Occupational Group (43-4061) (https://data.bls.gov/oes/#/industry/000000). The hourly mean wage rate for functions performed by eligibility interviewers in government programs is $25.95 per hour. For this information collection States will incur an annualized administrative cost of $34.52 per burden hour. FNA reimburses 50 percent of the administrative costs to the State agencies, resulting in a reimbursement value of $17.26 per burden hour, which we use to determine the total cost to respondents. These costs include fully loaded wages which are 33% of total costs to include fringe benefits.

The Federal minimum wage rate of $7.25 per hour is used to calculate annualized costs for Debtors applying for SNAP benefits. There are no reimbursable costs to SNAP participants.

See table in A12A or Appendix D 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 cost to the Federal Government to collect and use the data for TOP is estimated to be $863,168.19, including fully loaded wages ($500,000 contract cost + $358,848.35 annual base Federal cost including fringe benefits + $4,319.84 Federal worker salary including fringe benefits). This has increased from the last submission by $23,596.81 (FY23 $839,571.38 – FY26 $863,168.19 = $23,596.81).

This total includes an estimated $500,000 (includes fringe benefits) for contracted computer services required for this collection, and an additional $161,108.82 for the Federal share reimbursed to State agencies for reporting, $185,845.05 for ADP or third-party support solution, and $11,894.48 for recordkeeping. The Federal share reimbursement to State agencies with fringe benefits is $358,848.35.

FNA estimates that a SNAP Branch Chief, General Schedule (GS) grade 14 step 1($67.02/hour), and a SNAP program analyst, GS grade 12 step 1 ($47.69/hour) will take approximately 20 and 40 hours, respectively, to analyze data received from this information collection, totaling $3,248.00 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB.pdf). The fully loaded (x .33) cost for Federal workers is $4,319.84. In accordance with 7 CFR 272.2, FNA reimburses 50 percent of allowable administrative costs to SNAP State agencies. This amount is included in the Federal government's 50/ 50 reimbursement to State agencies. The Federal share of State costs is $358,848.35 (State agency fully loaded wages $161,108.82 + ADP or third-party support solutions reporting fully loaded wages $185,845.05 + recordkeeping fully loaded wages $11,894.48). Thus, the total annual respondent cost is $550,406.02; there is no change as we are using the data from the last submission.

	Hours	Hourly Wage	Total
GS-12 Program Analyst, Step 1	40	$47.69	$1,907.60
GS-14 Branch Chief, Step 1	20	$67.02	$1,340.40
Total Cost of Federal Workers			$3,248.00
Total Cost with Fringe Benefits			$4,319.84

A15. Explanation of program changes or adjustments.

This is a reinstatement request for the burden hours only for this currently expired information collection. The current reporting burden inventory for this data collection is an overall

48,788.64 reporting and recordkeeping burden hours and 550,406.02 total annual responses for reporting and recordkeeping. We are estimating 47,179.09 reporting and recordkeeping burden hours (46,490.09 reporting + 689 recordkeeping hours), a decrease of 1,609.64 reporting hours due to recently updated time estimates from stakeholder consultations. The recordkeeping hours remain unchanged from the currently approved request. There are no changes to the current overall total annual response of 550,406. The currently approved respondents for debtors of 249,953, and 53 State agencies remains unchanged. There are no adjustments, as we are using the same data to account for data during the PHE.

FNA is also reporting 10,765.26 burden hours for ADP or third-party support solutions associated with sending data to TOP for only the State agencies (this burden is included above in the overall 46,490.09 reporting burden hours above for debtors and State agencies).

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.

There are no forms associated with this information collection. While the content of the notice is mandated by Treasury, it does not mandate a specific format. The address requests and weekly files are submitted via electronic data transmission as required by Treasury. FNA does display the expiration date for OMB approval of the information collection for all the instruments it does use.

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.