

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0579:

Major Changes in Program Design

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Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3

A2. PURPOSE AND USE OF THE INFORMATION.....3

A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....4

A4. EFFORTS TO IDENTIFY DUPLICATION.....5

A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....5

A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....5

A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....6

A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....6

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 GRANTEEES.....7

A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....7

A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....7

A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....8

A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....2

A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....2

A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....3

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.....4

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.....4

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.".....4

Appendices

- A. Section 11 of the Food and Nutrition Act of 2008
- B. 7 CFR 272.15
- C. Major Changes Notification Template
- D. Major Changes Quarterly Reporting Template
- E. Major Changes Quarterly Reporting Template for Call Center Modifications

F. Excel Burden Table

G. Public Comments and Responses

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 revision of an approved information collection set to expire 5/31/2026. The title listed for the currently approved collection is "A Review of Major Changes in Program Design and Management Evaluation Systems". However, this collection does not include information directly associated with Management Evaluation Systems (which is included in OMB control number 0584-0010, expiration 8/31/26). Therefore, FNS requests to revise the title to "Major Changes in Program Design" to align with the information requested. The Food, Conservation, and Energy Act of 2008 (Public Law 110-246) amended Section 11(a)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2020; the Act) (Appendix A), to require the Department of Agriculture (the Department) to develop standards for identifying major changes in the operations of State SNAP agencies. The resulting standards are codified at 7 CFR 272.15.

Per Section 11(a)(4)(B) (Appendix A) of the Act, State agencies implementing major changes must notify FNS and collect information to identify and correct negative impacts on program integrity or access.

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 collection is mandatory for State agencies implementing major changes in SNAP operations and is used to identify and correct negative impacts on program integrity or access. Regulations at 7 CFR 272.15 (Appendix B) require State agencies to notify FNS when planning to implement a major change in SNAP operations. Major changes include closing local offices, increasing reliance on automated systems, changing operations that may increase difficulty for households to report required information, reducing or changing responsibilities completed by SNAP merit system personnel, or other activities identified by FNS. To notify FNS, State agencies complete the Major Changes Notification Template (Appendix C) and submit via the Waiver Information Management System (WIMS), a software platform used by State agencies for recordkeeping. The template includes a description of the change and an analysis of projected impact of the major change.

When the State submits a notification, FNS initiates a review to determine whether the change meets the regulatory criteria for a major change. If the change does not meet the criteria, FNS contacts the State agency to advise that the change does not qualify as major and provides guidance on the procedure to formally withdraw the notification. If the notification does meet the criteria, FNS works in partnership with the State agency to clarify any ambiguous or incomplete information and issues a letter of acknowledgement in response. The letter of acknowledgement outlines the reporting requirements, in accordance with applicable regulations and includes the appropriate reporting template(s) to be used by the State agency (Appendices D and E).

States implementing major program changes are required to submit quarterly reports to FNS. The quarterly reports must include detailed information to help identify and address any adverse impacts on program integrity or access. FNS reviews the data to monitor potential adverse effects, provides targeted technical assistance and ensures effective oversight. Additionally, the reports also

enable FNS to monitor the implementation of major changes and initiate corrective actions, as necessary.

All major changes must be documented using the Major Changes Quarterly Reporting Template (Appendix D). If the change involves call center operations, the State agency is also required to also report customer service-related data on the Major Changes Quarterly Reporting Template for Call Center Modifications (Appendix E).

In accordance with 7 CFR 272.15(b)(4) (Appendix B), FNS reserves the right to request additional information in a State agency's quarterly report when necessary to assess the impact of a major change on SNAP integrity and access. FNS collaborates with State agencies to identify what supplemental data is feasible to collect and ensures that only essential information is required.

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.

Burden Reduction:

FNS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. Currently, State agencies submit Major Changes in Program Design notifications and quarterly data metrics to FNS via WIMS at <https://www.wims.fns.usda.gov>; as such, we anticipate 100% 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. FNS has made every effort to avoid duplication. FNS has reviewed USDA reporting requirements, State agency administrative reporting requirements, and special studies by other government and private agencies. FNS monitors State agency performance to ensure that the program is efficiently and economically operated. FNS is solely responsible for reviewing State agencies executing major changes in SNAP design. FNS is not aware of any State agency monitoring systems designed to obtain data similar to that required for this information collection.

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 is held to the minimum required for the intended use. No small entities are impacted by this collection of information. The collection is limited to what is necessary to comply with statutory requirements and to protect SNAP integrity. This information collection is solely limited to SNAP State agencies.

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 ongoing and mandatory quarterly data collection plays a critical role in evaluating how significant changes to SNAP design affects participant's access to benefits and other essential program elements. Without this regular collection, FNS would lack the necessary insight to effectively monitor these changes, detect potential compliance issues, and offer timely technical assistance to State agencies implementing major program modifications. Reducing the frequency of data collection

would delay FNS's ability to identify and address issues early, increasing the risk that non-compliant practices persist and potentially compromise program integrity.

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.**

There are no 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 notice for this information collection published in the Federal Register on January 7, 2026, and can be found on page 496, (91 FR 496). FNS received one relevant public comment during the 60-day notice period (Appendix G). The comment acknowledged the significance of collecting the information and suggested simplifying the forms or automating collection systems to make the process more efficient. FNS appreciates all public comments and has taken the comments into consideration in the information collection request submitted to OMB.

FNS engaged stakeholder consultation with three State agency representatives: C. Hall from the Kentucky Cabinet for Health and Family Services, A. Sharpe from the Tennessee Department of Human Services, H. Knies from the Ohio Department of Job and Family Services. As a result of feedback from these State agency representatives, we adjusted the estimated number of hours per response of a notification of a major change from 60 hours to 70 hours, quarterly reporting from 70 hours to 75 hours and additional data reporting from 70 hours to 80 hours. The estimated number of hours per response for quarterly reporting associated with a Call Center remains at 50 hours per response.

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.

FNS complies with the Privacy Act of 1974. No private information is associated with this collection of information. This information collection request has been reviewed and cleared by USDA FNS Privacy Officer, Evlyn Hearne, on May 26, 2026.

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. This information collection request has been reviewed and cleared by USDA FNS Privacy Officer, Evlyn Hearne, on May 26, 2026.

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 hourly burden are shown in the attached Burden Table (Appendix F). A summary of the burden appears below.

Reporting Burden

FNS estimates approximately 20 State agencies will submit two (2) major change notifications annually (Appendix C), resulting in a total of 40 responses. At an estimated 70 hours per response, the total annual burden for notifying FNS of major changes in SNAP design is projected to be 2,800 hours (20 State agencies x 2 major change notifications per State agency x 70 hours per response = 2,800 estimated total burden hours). This reflects an increase of 2,020 hours compared to the previous

submission. The per response estimate was adjusted from 60 hours per response to 70 hours per response as a result of State agency consultations.

Of the 20 State agencies submitting major change notifications, FNS estimates that 33 notifications (an increase of 25) will qualify as major changes requiring quarterly reporting (Appendix D). The total of respondent State agencies remains at 20 and is included in the burden calculations but not double-counted in the respondent total. Each major change typically necessitates four (4) quarterly reports, resulting in a total of 132 quarterly reports (33 qualified major changes x 4 quarterly reports), an increase of 100 quarterly reports from the 32 previously approved quarterly reports. At 75 hours per quarterly report, the total burden for this provision is 9,900 hours (33 major changes x 4 quarterly reports x 75 hours per quarterly report, representing an increase of 7,660 hours from the prior estimate of 2,240 hours. The per response estimate was adjusted from 70 hours to 75 hours as a result of State agency consultations. The increase is due to an expanded number of State agencies reporting major changes in SNAP design and the growing reliance on automated systems and an increase from 70 hours to 75 hours per response.

Additionally, three of the 26 major changes will involve call center modifications, requiring four quarterly reports for call center modifications each (Appendix E). The estimated number of respondents is included in the burden calculations but not double-counted in the respondent total. Using 50 estimated hours per response, the total burden for call center-related changes is 1,600 hours (8 major changes x 4 quarterly reports for call center modification x 50 hours per response = 1,600 estimated total burden hours), an increase from the previous estimate of 1,000 hours. The per-response estimate remains at 50 hours per quarterly report for call center modifications. The increase

is due to an expanded number of State agencies reporting major changes in SNAP design through innovated processes and modernized systems.

Finally, FNS anticipates that one major change notification will require reporting beyond the standard quarterly reporting submissions outlined in Appendices D and E. This additional reporting is included in the burden estimate but not duplicated in the respondent count. At 80 estimated hours per response, results in a total of 320 estimated total burden hours annually (1 major change × 4 additional reporting responses × 80 hours per additional reporting response= 320 hours annually), a decrease from the previous estimate of 4,840 estimated burden hours annually. This revision more accurately captures the scope of major changes requiring supplemental reporting and an increase in the per response estimates based on State agency consultations. A summary of the burden appears below.

Type of respondents (optional)	Burden Activity	Forms/ Instruments (Optional Column)	CFR Citation (Optional Column)	Estimated Number of Respondents	Responses per Respondent (Col. H/F)	Total Annual responses (Col. F x G)	Estimated Hours Per Response (Col. J/H)	Estimated Total Burden Hours (Col. H x I)
State Agency	Major Change Reporting	Major Changes Notification Template (Appendix C)	7 CFR 272.15(a)(3)	20	2	40	70	2,800
		Major Changes Quarterly Reporting Template (Appendix D)	7 CFR 272.15(b)(1)-(3)	20	7	132	75	9,900
		Major Changes Quarterly Reporting Template for Call Center Modifications (Appendix E)	7 CFR 272.15(b)(4)(iv)	8	4	32	50	1,600
			7 CFR 272.15(b)(4)	1	4	4	80	320
State Agency Subtotal Reporting				20	10.4000	208	70.2855	14,620

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

The estimated annualized, fully loaded (x .33) cost to respondents after 50 percent reimbursement from the Federal government is \$536,184.85. See table below. The estimate of respondent cost to the States is based on the estimated total burden hours and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2024 National Occupational and Wage Statistics, Management Analysts (13-1111).¹ The hourly mean wage for functions performed by management analysts is estimated at \$55.15 per staff hour.

Respondent Category	Forms/ Instruments (Optional Column)	Estimated Total Burden Hours (Col. H x I)	Base Hourly Wage Rate (See BLS)	Fully Loaded Wage Rate (K+ (K*.33))	Fully Loaded Wage Rate with 50% Reimbursement	Total Annualized Cost of Respondent Burden (J*K)	Annualized Cost to Respondent with 50% Reimbursement
State Agency	Major Changes Notification Template (Appendix C)	2,800	\$55.15	\$73.35	\$36.67	\$205,378.60	\$102,689.30
	Major Changes Quarterly Reporting Template (Appendix D)	9,900	\$55.15	\$73.35	\$36.67	\$726,160.05	\$363,080.03
	Major Changes Quarterly Reporting Template for Call Center Modifications	1,600	\$55.15	\$73.35	\$36.67	\$117,359.20	\$58,679.60

¹ Available at: <https://data.bls.gov/oes/#/industry/000000>.

	(Appendix E)						
	Reports with additional data collection	320	\$55.15	\$73.35	\$36.67	\$23,471.84	\$11,735.92
State Agency Subtotal Reporting		14,620	\$55.15	\$73.35	\$36.67	\$1,072,369.69	\$536,184.85

Note* Total Cost to Respondent rate for Reporting and Recordkeeping is after 50 percent reimbursement by FNS.

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 total annual cost to the Federal Government is \$538,942.30. FNS estimates that a SNAP Branch Chief, General Schedule (GS) grade 14 step 1 (\$68.27/hour), and a SNAP Program Analyst, GS grade 13 step 1 (\$57.78/hour) will take approximately 15 and 30 hours, respectively, to analyze data received from this information collection, totaling 2,757.45² The fully loaded (x .33) cost is \$3,667.41. Thus, the total annual respondent cost

² Available at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf.

is \$538,942.30 (including the estimates provided in 12B). A summary of the estimates appears below.

FNS SNAP ICR Federal Cost Estimate (OMB Control No. 0584-0579)			
Activity	Estimated Total Annual Burden Hours	Estimated Hourly Wage Rate	Cost (US\$) (approx.)
Review of Information Collection			
Reviewing - National Office Program Analyst (GS 13/1)	30	\$57.78	\$1,733.40
Reviewing - National Office Branch Chief (14/1)	15	\$68.27	\$1,024.05
<i>Costs of Federal Workers</i>			<i>\$2,757.45</i>
<i>Add 50% Federal Share of State Cost</i>			<i>\$536,184.85</i>
Total Cost to Federal Government (Federal workers cost + 50% State Cost)			\$538,942.30

A15. Explanation of program changes or adjustments.

This is a revision of a currently approved information collection. The title listed for the currently approved collection is “A Review of Major Changes in Program Design and Management Evaluation Systems”. However, this collection does not include information directly associated with Management Evaluation Systems (which is included in OMB control number 0584-0010, expiration 8/31/26). Therefore, FNS requests to revise the title to “Major Changes in Program Design” to align with the information requested.

The currently approved burden inventory is 13 State agency respondents. Additionally, the currently approved inventory for this collection includes a total of 85 annual responses and 8,860 total annual burden hours for State agencies. In this adjustment, FNS made revisions as a result of the number of State agency respondents, the frequency of responses initiated by the respondents, and increases in the estimated

burden hours per response.

FNS's revised figures are based upon the number of responses (major change notifications) received from FY 2023 through FY 2025. Based on recent trends, FNS is increasing the burden estimates to account for increases in State agencies implementing major changes in non-merit personnel and increased reliance on automated systems, such as robotic process automation (RPA) or bots. Additional data collection on advanced automation is necessary to identify and correct any adverse effect on program integrity or access including access by vulnerable households.

This adjusted burden estimate accounts for the increase in the number of respondents from 13 to 20 State agencies and an increase in the frequency from 1 to 2 responses (Appendix C) submitted by each respondent. These two revisions correlate with increases in the remaining collection figures. Subsequently, there are increases in the total annual responses (Appendices D - E) and additional reporting beyond mandatory reporting) from 85 to 320, increases in the burden per response as a result of State agency Consultations and the estimated total burden hours from 8,860 to 14,620. In total, there is a net increase of 5,760 estimated total burden hours to the existing information collection.

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.
