SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0587

Supplemental Nutrition Assistance Program Multiple Card Replacement

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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 request (ICR). The Food and Nutrition Act of 2008 (the Act)[1], as amended, specifies national eligibility standards and imposes certain administrative requirements on State agencies in administering the Program. The Food and Nutrition Administration (FNA) is still legally required to collect this data and is thereby continuing to collect in violation of the Paperwork Reduction Act.

Federal regulations at 274.6(b)(6)[2] (Appendix A) require that State agencies monitor EBT card replacement requests and send notices to households when they request four cards within a 12-month period. The State agency may determine a threshold for excessive card replacements, which must not to be less than four replacement cards in a 12-month period. When EBT card replacement requests have been deemed excessive, a State agency may choose to either withhold a replacement card until an individual from the household has made contact with the State agency to provide an explanation for the excessive requests, or the State agency may send a notice upon the fourth request for a replacement card in a 12-month period alerting the household that their account is being monitored for potential trafficking, misuse, or fraudulent use of Supplemental Nutrition Assistance Program (SNAP) benefits.

[1] https://www.govinfo.gov/content/pkg/COMPS-10331/pdf/COMPS-10331.pdf
[2] https://www.ecfr.gov/current/title-7/part-274/section-274.6#p-274.6(b)(6)

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.

This statement supports the request to reinstate an expired information collection for an information collection related to collection to monitor excessive replacement EBT cards to reduce SNAP fraud waste and abuse by discouraging SNAP benefit trafficking. FNA is still legally required to collect this data and is thereby continuing to collect it in violation of the Paperwork Reduction Act. Per Federal regulations at 7 CFR 274.6(b)(5) and 7 CFR 274.6(6), State agencies must set a threshold on excessive replacement cards and monitor household requests for replacement cards. Once the threshold has been exceeded, the State agency has two options. They may either provide a notice to the client to alert the household that they are monitoring their account for potential, suspicious activity. If another replacement card is subsequently requested and trafficking is suspected, the State agency shall refer that case to the State's fraud investigation unit. Or the State agency may instead opt to notify the household in writing that the State agency is withholding the card until contact is made. After the household has contacted the State agency, the replacement card will be issued.

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.

In compliance with E-Government Act of 2002[3], State agencies have the authority to use the technology that best suits the needs of their individual or unique systems of operation to comply with the reporting and recordkeeping requirements contained in this submission. FNA has made every effort to provide for electronic submission as an alternative to paper submission in compliance with the E-Gov. FNA provides funding to support the development of electronic systems through Federal matching of States' administrative costs. However, for this ICR, there is no information that will be collected electronically.

A3.2 Burden Reduction:

FNA provides templates, best practices, and technical assistance to States to make their notices as clear and simple to understand as possible. FNA also encourages States to automate notice distribution when possible and provides technical assistance to States making system improvements.

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. Every effort has been made to avoid duplication. FNA has reviewed U.S. Department of Agriculture reporting requirements, State administrative

[3] https://www.justice.gov/opcl/e-government-act-2002

agency reporting requirements, and special studies by other government and private agencies. FNA monitors State performance to ensure that the Program is being efficiently 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 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 consequences 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 ICR. The issuance of this notice is for the purpose of administering an ongoing program. Doing so less frequently would not allow FNA to comply with statutory and regulatory requirements and would result in a direct violation of the Act. Further, without this information collection, there is an increased risk of benefits not being issued accurately or fraudulent activities occurring, such as trafficking.

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[4].

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.

[4] https://www.ecfr.gov/current/title-5/section-1320.5

A notice was published in the Federal Register on Wednesday, March 11, 2026, Volume 91, pages 11947-11949. As of May 1, 2026, five public comments were received related to this notice. These comments and responses are included in Appendix A. None of the five commentors had suggestions for the ICR but rather had input on the regulation itself. Since no comments recommended changes to the cost or burden of this information collection, we have made no changes to our burden calculations in response to the public comments FNA received.

FNA consults with Regional Offices regarding any proposed process or procedural changes as a result of regulatory changes. Regional Offices are in constant contact with State agencies which provide feedback on FNA processes and procedures that may impact them. For this specific information collection, FNA contacted the following individuals: Brian C. (District of Columbia Department of Human Services), Kasey R. (Illinois Department of Human Services), Carl F. (Pennsylvania Department of Human Services), Virginia H. (South Dakota Department of Social Services), and Leslie W. (Vermont Agency of Human Services). FNA sent these State agency contacts the Federal Register Notice and asked to share any feedback on the information collected related to multiple card replacement to include their views on the frequency of collection, the clarity of instructions and recordkeeping, disclosure, and on the data elements to be recorded, disclosed, or reported. As of May 1, 2026, feedback from SNAP State agencies and the District of Columbia regarding this collection notice included one comment from Kentucky: stating support for the related regulation but not offering any feedback on this ICR.

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.

FNA complies with the Privacy Act of 1974 (5 USC 552a), which governs Federal agencies' access, use, and disclosure of information concerning individuals. The information provided will be kept private and will not be disclosed to anyone but staff involved in the card replacement process, except as otherwise required by law. This information collection was reviewed by Deaa Coleman, FNA Privacy Officer, on 1/5/26.

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 estimate that 32,127 households will read and receive the replacement card warning notice once. This will take about 0.0334 hours, for a total of 1,073.04 burden hours annually (32,127 respondents x 0.0334 hours = 1,073.04 hours annually). Half of these households, 16,064 respondents, will read the notice that their replacement card has been withheld, and they will contact their State agency. This action will take each respondent approximately 0.5 hours, for a total of 8,031.76 burden hours annually (16,064 respondents x 0.5 hours = 8,031.76 hours). About 258,477 households will receive and read an excessive replacement card notice once, which will take approximately 0.0334 hours, for a total of 8633.12 burden hours annually (258,477 respondents x 0.0334 hours = 8,633.14 hours).

Six State agencies have elected to implement the option (per 7 CFR 274.6(b)) to withhold a replacement card if it is over the threshold and determined to be excessive. These State agencies will issue the households a notice in writing when it has reached the replacement card threshold, informing them that that next card replacement request will require contact with the State agency to provide an explanation before a new card is issued. These State agencies will also notify the household in writing once they've exceeded the threshold and that the card has been withheld until the household contacts the State agency.

Each of the six State agencies will issue the replacement card warning notice about 5,355 times for a total of 32,127 responses annually (6 State agencies x 5,355 notices issued = 32,127 total notices issued). The total number of burden hours annually for the warning notice is 1,073.04 hours (32,127 notices annually x 0.0334 hours = 1,073.04 hours annually).

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
Individuals/Households									
274.6(b)(5)	Reading Withhold Replacement Card Warning Notice	32,127	1	32,127	0.0334	1,073.04	$7.25	$7.25	$7,779.56
274.6(b)(5)	Reading Replacement Card Withheld Notice and making contact with State agency	16,064 *	1	16,064	0.500	8,031.76	$7.25	$7.25	$58,230.26
274.6(b)(6)	Reading Excessive Replacement	258,477	1	258,477	0.0334	8,633.12	$7.25	$7.25	$62,590.12

	Card Notice								
Household Total		**292,064**	**1**	**307,835.46**	**0.0607**	**17,737.92**	**$7.25**	**$7.25**	**$128,599.94**

*16,064 Individuals/Households (I/H) SNAP participants are the same I/H accounted for in the 32,127 and therefore not double counted

State Agencies									
274.6(b)(5)	Withhold Replacement Card Warning Notice	6	5,355	32,127	0.0334	1,073.0431	$12.98	$17.26	$18,524.37
274.6(b)(5)	Replacement Card Withheld Notice	6	2,677	16,064	0.0334	536.52	$12.98	$17.26	$9,262.19
274.6(b)(6)	Excessive Replacement Card Notice	47	5,500	258,477	0.0334	8,633.12	$12.98	$17.26	$149,037.00
State Agency Total		**53**	**5,511**	**292,064**	**0.0334**	**10,242.68**	**$12.98**	**$17.26**	**176,823.56**
Grand Total		**292,117**	**2**	**584,128**	**0.0479**	**27,980.61**			**$305,423.50**

Six State agencies will issue a notice to households that their replacement card is withheld and will not be issued until contact is made with the State agency. These six State agencies will each issue approximately 2,677 replacement card withheld notices, for a total of 16,064 notices issued annually (6 State agencies x 2,677 notices = 16,064 notices annually). Each notice takes about 0.0334 hours to issue. The total number of burden hours annually for the State agency staff to issue the replacement card withheld notice is 536.52 hours (16,064 notices issued x

0.0334 hours = 536.52 hours annually).

The estimated burden for this information collection including the number of respondents, frequency of response, average burden hours per response, and annual burden hours are shown in the burden table below (Appendix B).

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

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' May 2024 Occupational Employment and Wages Statistics report, Occupational Group (43-4061) (https://data.bls.gov/oes/#/industry/000000) which identified a median wage rate of $25.95 per hour for eligibility interviewers in government programs. Including fully loaded wages (x 1.33) to account for fringe benefits, States would incur an annualized administrative cost of $34.52 per burden hour in completing the information collection. FNA reimburses 50 percent of administrative costs to the State agencies. This results in a reimbursement value of $17.26 per burden hour which we use to assess the total cost to respondents.

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

SNAP participants.

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 or start-up or ongoing operation or 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 for this information collection is estimated to be $181,873.40 ($177,497.17 fully loaded State agency staff wages + $4,376.23 fully loaded Federal staff wages = $181,873.40). This total includes the reimbursable costs incurred by the State agencies.

It is estimated that Federal staff will spend a total of 60 hours working on this ICR. 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 ($48.75/hour) will take approximately 20 and 40 hours, respectively, to analyze data received from this information collection, totaling

$3,290.40 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB.pdf). The fully loaded (x .33) cost for Federal workers is $4,376.23 annually.

Federal Wages			
Federal Worker	**Hours**	**Hourly Wage**	**Total**
GS-12 Program Analyst, Step 1	40	$49.07	$1,962.80
GS-14 Branch Chief, Step 1	20	$68.96	$1,379.20
Total Cost of Federal Workers			$3,342.00
Total Cost with Fringe Benefits			**$4,444.86**

A15. Explanation of program changes or adjustments.

This statement supports the request to reinstate an expired information collection for an information collection; FNA is still legally required to collect this data and is thereby continuing to collect in violation of the Paperwork Reduction Act. The current overall burden inventory for this information collection is 292,117 respondents (53 State agencies and 292,064 households in the affected public). We are requesting 27,980.61 burden hours (17,737.92 burden hours for households and 10,242.68 for State agencies) and 584,128 total annual responses (292,064 total annual responses for households and 292,064 total annual responses for State agencies)

for this information collection. This request reflects a decrease of 7,881.87 total annual burden hours and a decrease of 201,663 total annual responses (785,791 (Fiscal Year (FY) 23 total annual responses) - 584,128 (current total annual responses) = 201,663 annual responses. This adjustment is a result of using the most recent SNAP data in calculating this burden. The most recent SNAP data shows a decrease in participation as compared with FY21 data used in the last submission for this information request. In FY21, there were approximately 28.1 million SNAP households, and in FY25, there were about 22.5 million SNAP households.

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	584,128	0	0	201,663	0	785,791
Annual Burden Hours	27,980.61	0	0	7,881.86	0	35,862.47

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.