

**Estimate of the Information Collection Burden -- Supplemental Nutrition Assistance Program
(SNAP) Forms: Applications, Periodic Reporting, Notices
(OMB Control Number 0584-0064; Expiration date April 30, 2016)**

Summary of Adjustments

After careful review and consideration of the burden inventory under OMB No. 0584-0064, FNS has determined the burden baseline does not accurately reflect the burden activities or hours required by the SNAP under this collection. We have corrected the burden inventory baseline to establish burden estimates that more accurately reflect the burden needs of the program and expanded the activities under OMB No. 0584-0064 to accurately reflect all of the information collection activities within the SNAP application and recertification process. Details are provided in this document.

In the process for organizing this information collection, we realized the burden activities and time estimates for OMB No. 0584-0064 are no longer adequate for meeting the burden needs of rising household cases, local offices with scarce resources and fewer caseworkers, multi-program applications and automated forms. Section 3502.2 of the PRA defines burden as “time, effort, or financial resources expended by a person to generate, maintain, or provide information to or for a Federal agency.” In keeping with the PRA definition of burden, we created sub-activity categories that allowed for the inclusion of time and effort expended on behalf of households and State agencies and revised the time estimates.

The following tables compare the time estimates for activities contained in the currently approved information collection with the revised burden baseline activities and time estimates in this package.

FSP – Food Stamp Program
SNAP – Supplemental Nutrition Assistance Program

Time Estimates Established in the currently approved OMB No. 0584-0064		Activities and Time Estimates for Revising Burden Baseline for OMB No. 0584-0064	
State agency		State agency	
Information collection activities	Time estimate (minutes)	Information collection activities	Time estimate (minutes)

Initial FSP Application	19		Initial Application	19
			Interview	30
			Verification	24
Recertification FSP Application	19		Recertification Application	15
			Interview	20
			Verification	10
Reports			Periodic Reports	
Monthly Reports	11		Monthly Reports	7
Quarterly Reports	12		Quarterly Reports	8
Simplified Reports	11		Simplified Reports	11
Change Reports	11		Change Report	11
Notices			Notices	
Notice of Eligibility or Denial	2		Notice of Eligibility or Denial	2
Notice of Missing or Incomplete Report	2		Notice of Missing or Incomplete Report	2
Notice of Missed Interview	1		Notice of Missed Interviews	1
Notice of Expiration	2		Notice of Expiration	2
Notice of Adverse Action	2		Notice of Adverse Action	2
Adequate Notice for Monthly Reports	2		Adequate Notice	2
Request for Contact	2		Request for Contact	2
Transition Notice	0		Transitional notice	0

Time Estimates Established in the Currently Approved OMB No. 0584-0064		Activities and Time Estimates for Revising Burden Baseline for OMB No. 0584-0064	
Households		Households	
Information collection activities	Time estimate (minutes)	Information collection activities	Time estimate (minutes)
Initial FSP Application	19	Initial SNAP Application	19
		Interview	30
		Travel time – In office interview	120
		Verification	24
Recertification FSP Application	19	SNAP Recertification Application	15
		Interview	20
		Travel time – In office interview	120
		Verification	10
Reports		Periodic Reports	
Monthly Reports	7	Monthly Reports	7
Quarterly Reports	8	Quarterly Reports	8
Simplified Reports	8	Simplified or Periodic Reports	10
Change Report	5	Change Reports	10
Notices		Notices	
Notice of Missed Interview	1	Notice of Missed Interviews	1
Notice of Adverse Action	1	Notice of Adverse Action	1
Adequate Notice	1	Adequate Notice	1
Request for Contact	2	Request for Contact	2

The time estimates and activities were determined in accordance with multiple studies (See *Sources* at the end of this document) and FNS Regional offices’ input concerning each step of the application process. These changes have been incorporated within this document and Item 12 of the Supporting Statement.

OMB No. 0584-0064

AFFECTED PUBLIC: STATE AGENCIES

STATE AGENCY BURDEN WITH ADJUSTED BURDEN BASELINE

As previously stated, our currently approved burden baseline for OMB No. 0584-0064 does not accurately reflect all of the activities and time estimates associated with the information collected for the SNAP applications process. The burden activities under OMB No. 0584-0064 do not include the burdens concerning the interview and verification components of the initial SNAP application and recertification application process. Therefore, the burden activities and estimates approved in past collections for OMB No. 0584-0064 did not accurately represent the burden activity needs of the program, which led to a significantly underestimated burden baseline. FNS has reassessed the burden activities to establish a more accurate baseline. The following section illustrates the revised burden activities used to revise the baseline reporting burden for this information collection.

Application to Participate in SNAP

Section 273.2 of the SNAP regulations requires that each applicant household complete and file an application, either in paper or electronic form. The application contains detailed information about each household member and their income, employment, shelter expenses, medical expenses (if applicable) and resources that are necessary to determine if the applicant household is entitled to assistance. The application process also includes the verification of the information provided on the application and an interview where the State agency asks a series of questions and collects more information. The burdens associated with the activities of the application process are included below.

Initial Application form

Adjusted State agency burden: FNS adjusted the number of households impacted to account for an increase in household participation. It is estimated that a caseworker can review a household application in 19 minutes or 0.3173 hours. **This yields a total burden of 3,556,686.46 hours for all 53 State agencies (*11,209,223 initial applications x 19 minutes or .3173 hours = 3,556,686.43 hours).** (*FY 2014 National Data Bank – Total Initial Applications Report)

Previous State agency burden: Previous burden for this activity was 3,509,730.88 (10,967,909.00 applications x .32 hours = 3,509,730.88). **The result is an increase in burden of 46,955.58 hours due to increased participation.**

Interview

Adjusted State agency burden: In revising the burden baseline, we have incorporated the interview, per section 273.2(e)(1) of the regulations, as a sub-activity to reflect the burden associated with this step of the application process.

FNS estimates that a caseworker can conduct a household interview in 30 minutes or 0.500 hours.

This yields a total burden of 5,604,611.50 for all 53 State agencies (*11,209,223 initial application interviews to be interviewed x .5000 hours = 5,604,611.5 hours). (*FY 2014 National Data Bank – Total Initial Applications Report)

Previous State agency burden: Burden hours associated with the interview were not previously included under SNAP applications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated burden for the interview to properly reflect the burden associated with this step of the process. **The result is an increase of 5,604,611.50 new burden hours.**

Verification

Adjusted State agency burden: Based on input received from FNS regional offices on initial application verification times, we estimated that when verified, each item will take 3 minutes or .0501 hours. However, since all verification requirements found in sections 273.2(f)(1) and (2) of the regulations do not apply to all initial applicant cases, we estimated an average of 24 minutes for the verification process (4,474,836 total verification hours / 11,209,223 initial applications = .4 hours or 24 minutes).

Activity	No. State Agencies	Annual Reports or Records Filed	Total Annual Responses	No. Burden Hrs per Response	Estimated Total Burden
Income (all initial applications)	53	211,494.77	11,209,223.00	0.0501	561,582.07
Identity (all initial applications)	53	211,494.77	11,209,223.00	0.0501	561,582.07
Alien Eligibility	53	211,494.77	11,209,223.00	0.0501	561,582.07

Social Security Number (all initial applications)	53	211,494.77	11,209,223.00	0.0501	561,582.07
*Medical expenses (if claimed and to receive income deduction)	53	13,132.08	696,000.24	0.0501	34,869.61
Residency (all initial applications)	53	211,494.77	11,209,223.00	0.0501	561,582.07
*Utility Expenses (if the State agency does not utilize a standard utility allowance and the applicant wishes to claim expenses)	53	244,509.4340	12,959,000.00	0.0501	649,245.90
*Hours Worked (Able-bodied Adults w/out Dependents)	53	69,890.42	3,704,192.00	0.0501	185,580.02
*Legal obligation to pay child support and actual child support payments	53	6,867.92	364,000.00	0.0501	18,236.40
*Disability	53	68,547.17	3,633,000.01	0.0501	182,013.30
Household composition (all initial applications)	53	211,494.77	11,209,223.00	0.0501	561,582.07
*Questionable Information	53	11,035	584,872.00	0.0501	29,302.09
*Student work hours (Not mandatory verification, but State agencies determine student's compliance with the 20-hour minimum requirement per 273.5(b)(5) to determine SNAP eligibility)	53	2,296	121,688	.0501	6,096.57
Total	53	1,685,246.99	89,318,090.51	.0501	4,474,836.33

*Based on household participation data from Characteristics of Supplemental Nutrition Assistance Program Households FY 2014 (February 2015) and input from FNS Regional Offices

Previous State agency burden: Burden hours associated with mandatory verification were not previously included under SNAP applications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated the verification as a sub-activity to reflect the burden associated with this step of the process. **The result is an increase of 4,474,836.33 new burden hours.**

Application for SNAP Recertification

Section 273.10(f) of the regulations requires that all households participating in SNAP must be assigned certification periods of a definite length. According to section 273.14(b), to continue participating in SNAP, ongoing households must apply for recertification prior to the end of their current certification periods. The recertification form and process is similar to the initial application and is completed and used in the same manner. However, verification requirements are reduced and States are permitted under Federal regulations to use a simplified version of the initial application.

Recertification form

Adjusted State agency burden: FNS estimates that a caseworker can review a household recertification application in 15 minutes or 0.2500 hours. This is a reduction of 4.2 minutes from the previous estimate due to efficiencies in the process. The reduction, however, is offset by an increase to participation. **This yields a total burden of 3,654,910.5 for all 53 State agencies (*14,619,642 recertification applications x .2500 hours = 3,654,910.50 hours).** (*FY 2011 National Data Bank – Total Recertification Applications Report)

Previous State agency burden: The previous burden for this activity was 3,238,956.48 hours (10,121,739 annual applications x .32 hours = 3,238,956.48 hours). **The result is a net increase of 415,954.02 burden hours due to increased participation.**

The previously approved burden estimate included “Additional Application for Recertification affected by Final Rule 7 CFR 273.12(a)(5), formerly 7 CFR 273.12(a)(1)(vii).” This burden was a one-time burden associated with households that were added to simplified reporting due to the 2002 final rule. These same households are now included in the overall SNAP caseload. **This results in a reduction (or avoidance of duplication) of 724,154 burden hours for recertification applications.**

Interview

Adjusted State agency burden: Generally, caseworkers are able to conduct a recertification interview, per 273.14 (b)(3) in less time than the initial interview since the household information is already in the State agency system. FNS estimates that a caseworker can conduct a household interview in 20 minutes or 0.334 hours. **This yields a total burden of 4,882,960.43 for all 53 State**

agencies (*14,619,642 recertification application interviews x .334 hours = 4,882,960.43 hours).
 (*FY 2014 National Data Bank – Total Recertification Applications Report)

Previous State agency burden: Not previously proposed since this activity was not included under the SNAP applications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated the interview as a sub-activity to reflect the burden associated with this step of the application process. **The result is an increase of 4,882,960.43 new burden hours.**

Verification

Adjusted State agency burden: Based on input received from FNS regional offices on recertification verification times, we estimated that when verified, each item will take 6 minutes or .1002 hours. However, since the verification requirements found in section 273.2(f)(8)(i) of the regulations do not apply to all recertification cases, we estimated an average of 10 minutes for the verification process (2,387,768 total verification hours / 14,619,642 recertifications = .16 hours or 10 minutes).

Activity	No. State Agencies	Annual Reports or Records Filed	Total Annual Responses	No. Burden Hrs per Response	Estimated Total Burden
Income (if source changed or amount changed by more than \$50)	53	137,921.15	7,309,821.00	0.1002	732,444.06
Social Security Number (if Social Security number is new)	53	2,758.42	146,196.42	0.1002	14,648.88
Medical expenses (unreported and reoccurring expenses that have changed by more than \$25)	53	5,516.85	292,392.84	0.1002	29,297.76

Legal obligation to pay child support (if there were changes in obligation to pay)	53	13,792.12	730,982.10	0.1002	73,244.41
Utility expenses (if has changed by more than \$25)	53	13,792.12	730,982.10	0.1002	73,244.41
Hours worked (Able-bodied Adults w/out Dependents)	53	137,921.15	7,309,821.00	0.1002	732,444.06
Other information which has changed may be verified (this includes changes in ID, immigration status, residency, disability, HH composition)	53	137,921.15	7,309,821.00	0.1002	732,444.06
Total	53	449,622.95	23,830,016.46	0.1002	2,387,767.65

*Burden estimates in this table were determined with input from FNS Regional Offices

Previous State agency burden: Burden hours associated with mandatory verification were not previously included under SNAP recertifications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated the verification as a sub-activity to reflect the burden associated with this step of the process. **The result is an increase of 2,387,767.65 new burden hours.**

Periodic Reports

1. Monthly Report

Under section 273.21, households subject to monthly reporting are required to submit reports of their circumstances on a monthly basis. The report requests the information necessary to determine eligibility and benefits of affected households. Households subject to monthly reporting are

assigned certification periods of 12 months and submit 11 monthly reports a year plus the application for recertification.

Adjusted State agency burden: FNS estimates that a caseworker can review a monthly report in 7 minutes or .1169 hours. **This yields a total burden of 85,204.67 hours for the 2 State agencies that have monthly reporting (*728,868 reports x .1169 hours = 85,204.67 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous State agency burden: The previous burden for this activity was 282,161.88 hours (1,567,566.00 reports x .18 hours = 282,161.88 hours). The .18 hour time estimate was changed to .1169 hours or 7 minutes which is the new time estimated for this activity. The decrease in burden from the previous estimate also includes the decreased number of State agencies that have monthly reporting as well as the number of households that participate in this type of reporting system. **The result is a decrease of 196,957 burden hours.**

2. Quarterly Report

Under section 273.12 (a)(4), State agencies may require households to report changes on a quarterly basis. Since households are not required to submit a separate quarterly report when they submit an application for recertification, the quarterly report is submitted 3 times a year.

Adjusted State agency burden: FNS estimates that a caseworker can review a quarterly report in 8 minutes or 0.1336 hours. **This yields a total burden of 231,573.69 for 1 State agency (*1,733,336 reports x .1336 hours = 231,573.69 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous State agency burden: The previous burden for this activity was 479,681.40 hours (2,398,407 reports x .20 hours = 479,681.40 hours). The .20 hour time estimate was changed to .1336 hours or 8 minutes which is the new time estimated for this activity. The decrease in burden from the previous estimate also includes the decreased number of households that participate in this type of reporting system. **The result is a decrease of 248,108 burden hours.**

3. Simplified or Periodic Report

Section 273.12(a)(5) allows State agencies to establish a simplified reporting (SR) system, under which most households that are certified for 6 months or less are only required to report when the household's gross monthly income exceeds 130 percent of the Federal poverty level or when an

able-bodied adult without dependents (ABAWD) does not meet the minimum weekly work hour requirement. Households assigned certification periods greater than 6 months must submit a periodic report by the sixth month. State agencies may opt to require households to submit periodic reports at intervals from every 4 months to every 6 months.

Adjusted State agency burden: FNS estimates that a caseworker can review a simplified report in 11 minutes or .1837 hours. **This yields a total burden of 3,463,031 for 51 State agencies (*18,851,556 reports x .1837 hours = 3,463,031 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous State agency burden: The previous burden for this activity was 1,941,962.94 hours (10,788,683.00 reports x .18 hours = 1,941,962.94 hours). The .18-hour time estimate was adjusted to .1837 to accurately capture the 11 minutes for this activity. The increase in burden from the previous estimate results from the revised time estimate and the increase in household participation. **The result is an increase of 1,521,068 burden hours.**

4. Change Report Form

Under section 273.12(a)(1), households not subject to one of the periodic reporting systems (monthly, quarterly reporting or simplified reporting) are assigned to a reporting system commonly referred to as change or incident reporting. Households assigned to change reporting must report most changes in household circumstances within 10 days from the date that the change becomes known to the household.

Adjusted State agency burden: FNS estimates that a caseworker can review a change report in 11 minutes or .1837 hours. **This yields a total burden of 594,353 for 24 State agencies (3,235,456 reports x .1837 hours = 594,353 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous State agency burden: The previous burden for this activity was 299,671.74 hours (1,664,843.00 reports x .18 hours = 299,671.74 hours). The .18 hour time estimate was adjusted to .1837 to accurately capture the 11 minutes for this activity. The increase in burden from the previous estimate results from the revised time estimate and the increase in household participation. **The result is an increase of 294,682 burden hours.**

Notices

1. Notice of Eligibility or Denial

According to section 273.10(g)(1)(i) and (ii), this notice is used by State agencies to advise households of the disposition of their application for initial certification or recertification. If the household is denied, the notice contains the reason(s) for the denial and advises the household of its right to appeal. The burden has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 2 minutes or .0334 hours to generate this notice. **This yields a total burden of 1,260,831 for 53 State agencies (*37,749,439 notices for all SNAP applicants x .0334 hours = 1,260,831 hours).** (*FY 2014 National Databank – All Initial and Recertification Applications Report)

Previous State agency burden: The previous burden for this activity was 632,689.74 hours (21,089,658.00 notices x .03 hours = 632,689.74 hours). The .03 hour time estimate was adjusted to .0334 to accurately capture the 2 minutes for this activity. **The result is an increase of 628,142 burden hours due to increased participation.**

2. Notice of Missing or Incomplete Report

Sections 273.12(a)(4)(iii) and 273.12(a)(5)(iii)(D) relate to notice of missing or incomplete reports. This notice is used by State agencies to advise ongoing households when they have failed to submit the required monthly, quarterly or semiannual report altogether or, if the household submitted the report, that some of the information required to be included in such reports was not provided. The burden has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 2 minutes or .0334 hours to generate this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and FY 2012) in household participation (previous number of notices 35,125 x .735 = 25,817; 35,125+25,817 = 60,942). **This yields a total burden of 2,035.46 for 53 State agencies (60,942 notices x .0334 hours = 2,035.46 hours).**

Previous State agency burden: The previous burden for this activity was 1,053.75 hours (35,125.00 notices x .03 hours = 1,053.75 hours). The .03 hour time estimate was adjusted to .0334 to accurately capture the 2 minutes for this activity. **The result is an increase of 982 burden hours due to increased participation.**

3. Notice of Missed Interview (NOMI)

Sections 273.2(h)(1)(i)(D) and 273.14(b)(3)(iii) of the regulations apply to the NOMI. The NOMI is issued by State agencies to households that fail to appear for their scheduled initial or recertification interview, or in the case of households subject to telephone interviews, fail to contact the State agency or receive telephone calls initiated by the local office. The household may respond to the notice by requesting that the interview be rescheduled. The burden has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 1 minute or .0167 hours to generate this notice. The number of notices has been adjusted in accordance to the percentage increase (25.40% or .254 estimated increase in initial and recertification applications between FY 2009 and FY 2011) in household applications (previous number of notices 1,881,380 x .254 = 477,871; 1,881,380 + 477,871 = 2,359,251 notices) to estimate the number of notices. **This yields a total burden of 39,399.49 for 53 State agencies (2,359,251 notices x .0167 hours = 39,399.49 hours).**

Previous State agency burden: The previous burden for this activity was 37,627.60 hours (1,881,380.00 notices x .020 hours = 37,627.60 hours). The .020 hour time estimate was adjusted to .0167 to accurately capture the 1 minute for this activity. **The result is an increase of 1,772 burden hours due to increased participation.**

4. Notice of Expiration (NOE)

Per the regulations in section 273.14(b)(1), State agencies are required to mail a NOE to currently participating households at least 30 days prior to the expiration of their current certification period. The NOE is usually accompanied by the application for recertification. The NOE advises the household that its certification period is expiring and that to continue receiving assistance the household must file its application for recertification in a timely manner. The burden has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 2 minutes or .0334 hours to generate this notice. **This yields a total burden of 737,706.17 for 53 State agencies (*22,087,011 total participating households x .0334 hours = 737,706.17 hours).** (*FY 2012 National Data Bank – Participating Households)

Previous State agency burden: The previous burden for this activity was 303,652.17 hours (10,121,739.00 notices x .030 hours = 303,652.17 hours). The .030 hour time estimate was adjusted to .0334 to accurately capture the 2 minute for this activity. **The result is an increase of 434,054 burden hours due to increased participation.**

5. Notice of Adverse Action (NOAA)

According to section 273.13(a), the NOAA is issued by State agencies to participating households whose benefits will be reduced or terminated as the result of a change in household circumstances. The burden has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 2 minutes or .0334 hours to generate this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and F Y2012) in household participation (previous number of notices 953,915 x .735 = 701,128; 953,915 + 701,128 = 1,655,043). **This yields a total burden of 55,278.44 for 53 State agencies (1,655,043 notices x .0334 hours = 55,278.44 hours).**

Previous State agency burden: The previous burden for this activity was 28,617.45 hours (953,915.00 notices x .030 hours = 28,617.45 hours). The .030 hour time estimate was adjusted to .0334 to accurately capture the 2 minute for this activity. **The result is an increase of 26,661 burden hours due to increased participation.**

6. Adequate Notice

Sections 273.12(a)(4)(v) and 273.13(b) of the regulations apply to adequate notices. An adequate notice is sent to households by the State agency when the household's benefits are reduced or terminated based on information reported by the household itself. Adequate notices can also be used when mass changes occur. Mass changes are certain changes initiated by the State or Federal government that may affect the entire caseload or significant portions of the caseload. The burden

has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 2 minutes or .0334 hours to generate this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and FY 2012) in household participation (previous number of notices $210,752 \times .735 = 154,903$; $210,752 + 154,903 = 365,655$). **This yields a total burden of 12,212.88 for 53 State agencies (365,655 notices x .0334 hours = 12,212.88 hours).**

Previous State agency burden: The previous burden for this activity was 6,322.56 hours ($210,752.00$ notices x .030 hours = 6,322.56 hours). The .030 hour time estimate was adjusted to .0334 to accurately capture the 2 minute for this activity. **The result is an increase of 5,890 burden hours due to increased participation.**

7. Request for Contact (RFC)

According to section 273.12(c)(3)(i), the RFC notice is used to contact the household when the State agency receives information regarding a potential change in a household's eligibility or benefits and such information is not sufficient for the State agency to determine exactly how the household's status would be affected. The burden has been adjusted to account for the increase in household participation in SNAP.

Adjusted State agency burden: FNS estimates a burden of 2 minutes or .0334 hours to generate this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and FY 2012) in household participation (previous number of notices $953,915 \times .735 = 701,128$; $953,915 + 701,128 = 1,655,043$). **This yields a total burden of 55,278.44 for 53 State agencies (1,655,043 notices x .0334 hours = 55,278.44 hours).**

Previous State agency burden: The previous burden for this activity was 28,617.45 hours ($953,915.00$ notices x .030 hours = 28,617.45 hours). The .030 hour time estimate was adjusted to .0334 to accurately capture the 2 minute for this activity. **The result is an increase of 26,661 burden hours due to increased participation.**

8. Transitional Benefits Notice (TN)

Per section 273.29, State agencies that opt to provide transitional benefits must provide eligible

families a TN that includes detailed and specific information about the household's transitional benefits and rights. Because the TN and the NOE are very similar, the reporting burden associated with the TN is included in the reporting burden for the NOE.

State Agency burden: No burden was estimated under this notice activity.

RECORDKEEPING REQUIREMENTS

Section 11(a) of the Food and Nutrition Act mandates that State agencies keep records as may be necessary to ascertain whether the program is being conducted in compliance with the Act and the regulations. States are required under the Act to maintain such records for a period of 3 years from date of origin. Section 11(n) of the Act also requires that States check for duplicate participation. This revision does not affect the current recordkeeping burden under OMB No. 0584-0064.

1. Case Records - State agencies must keep records as may be necessary to ascertain whether the program is being conducted in compliance with the Act and the regulations. The Act and Section 272.1(f) of the regulations require States to maintain such records for a period of 3 years from date of origin. States are allowed to store records using automated retrieval systems and other features that do not rely exclusively on the collection and retention of paper records. There is no burden change for this activity.
2. Duplicate Participation System - Section 272.4(e) of the regulations require State agencies to search their files for duplicates in order to prevent individuals from receiving benefits in more than one household and to prevent households from receiving benefits in more than one jurisdiction within the State. The Act further requires State agencies to establish a system that will prevent an individual from receiving both food coupons and cash benefits in lieu of coupons in an SSI cash-out State or under a cash-out demonstration project. There is no burden change for this activity.

OMB No. 0584-0064
AFFECTED PUBLIC: HOUSEHOLDS

HOUSEHOLD BURDEN WITH ADJUSTED BURDEN BASELINE

As stated in the beginning of this document, our currently approved burden baseline for OMB No. 0584-0064 does not accurately reflect all of the activities and time estimates associated with the information collected for the SNAP applications process. The burden activities under OMB No. 0584-0064 do not account for the burden associated with the interview and verification components of the initial SNAP application and recertification application process. Therefore, the burden activities and estimates approved in past collections for OMB No. 0584-0064 did not accurately represent the household burden needs of the program, which led to a significantly underestimated burden baseline. FNS has reassessed the household burden activities to establish a more accurate baseline. The following section illustrates the revised burden activities used to revise the baseline reporting burden for this information collection.

Application to Participate in SNAP

Section 273.2 of the SNAP regulations requires that each applicant household complete and file an application, either in paper or electronic form. The application contains detailed information about each household member and their income, employment, shelter expenses, medical expenses (if applicable) and resources that are necessary to determine if the applicant household is entitled to assistance. The application process also includes the verification of the information provided on the application and an interview where the household is asked a series of questions and more information is obtained. The burdens associated with the activities of the application process are included below.

Initial Application form

Adjusted Household burden: FNS adjusted the number of households impacted to account for increase in household participation. It was estimated that a household can complete an application in 19 minutes or .3173 hours. **This yields a total burden of 3,556,686.46 hours (*11,209,223 applications x .3173 hours = 6,186,000.52 hours).** (*FY 2014 National Data Bank – SNAP Total Initial Applications)

Previous Household burden: Previous burden for this activity was 3,509,730.88 (10,967,909.00 applications x .32 hours = 3,509,730.88). The .32 hour time estimate was adjusted to .3173 to accurately capture the 19 minutes for this activity. **The result is an increase of 46,955.58 burden hours due to increased participation.**

Previous burden for this activity also included 4,600 hours to account for application collected following the BP Deepwater Horizon Oil Spill Reporting. **As this was a one-time burden, the burden for this activity has been removed, thus reducing burden by 4,600 hours.**

Interview

Adjusted Household burden: Based on Regional Office input, it was estimated that a household interview, per the requirement in section 273.2(e)(1) of the regulations, can be completed in 30 minutes or .5000 hours. **This yields a total burden of 5,604,611.50 (*11,209,223 households to be interviewed x .5000 hours = 5,604,611.50 hours).** (*FY 2014 National Data Bank – SNAP Total Initial Applications)

Previous Household burden: Burden estimates were not previously proposed since this activity was not included under the SNAP applications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated the interview as a sub-activity to reflect the burdens associated with this step of the application process. **The result is an increase of 5,604,611.50 new burden hours.**

Travel Time

SNAP regulations section 273.2(e)(1) require households to have a face-to-face interview for certification purposes, unless the household is certified for longer than 12 months or the face-to-face interview is waived due to a hardship. FNS has assumed a household burden of 2 hours to account for the time spent traveling to and from the local office to attend an in-office interview.

This assumption is supported under Section 3502.2 of the Paperwork Reduction Act where “the term ‘burden’ means time, effort, or financial resources expended by a person to generate, maintain, or provide information to or for a Federal agency.” Based on this, FNS considered that a 2 hour travel time should be captured as a burden for the household for the face-to-face interview component of the application process. This time estimate is supported by the findings of the *Food*

Stamp Program Access Study (see **Sources** on pg. 28) where applicant households reported making an average of 2.4 trips to the local office for filing the application, meeting with caseworkers and providing verification documentation. This study found that on average, households spent 2.2 hours traveling between their homes and the SNAP office.

Household burden: Based on the estimate that on average a face-to-face interview would translate to 2 hours of travel time for a SNAP applicant household, we estimated a total burden of 22,418,446.00 burden hours for initial applicant households (*11,209,223 all initial interviews x 2 hours of travel time = 22,418,446.00 hours). (* FY 2014 National Data Bank – SNAP Total Initial Applications) **The result is an increase of 22,418,446.00 new burden hours.**

Verification

Adjusted Household burden: Based on input received from FNS regional offices on verification times during the initial application process, we estimated that when verified, each item will take 4 minutes or .0668 hours. However, since all verification requirements found in sections 273.2(f)(1) and (2) of the regulations do not apply to each applicant case, we estimated an average of 32 minutes for the verification process (5,966,448.41 total verification hours / 11,209,223 initial applicants = .532 hours or 32 minutes).

Activity	Est. Number of Respondents	Annual Reports or Records Filed	Total Annual Responses	No. Burden Hrs per Response	Estimated Total Burden
Income (all initial applications)	11,209,223	1.00	11,209,223.00	0.0668	748,776.10
Identity (all initial applications)	11,209,223	1.00	11,209,223.00	0.0668	748,776.10
Alien Eligibility	11,209,223	1.00	11,209,223.00	0.0668	748,776.10
Social Security Number (all initial applications)	11,209,223	1.00	11,209,223.00	0.0668	748,776.10
*Medical expenses (if	696,000	1.00	696,000.00	0.0668	46,492.80

claimed and to receive income deduction)					
Residency (all initial applications)	11,209,223	1.00	11,209,223.00	0.0668	748,776.10
*Utility Expenses (if the State agency does not utilize a standard utility allowance and the applicant wishes to claim expenses)	12,959,000	1.00	12,959,000.00	0.0668	865,661.20
*Hours Worked (Able-bodied Adults w/out Dependents)	3,704,192	1.00	3,704,192.00	0.0668	247,440.03
*Legal obligation to pay child support and actual child support payments	364,000	1.00	364,000.00	0.0668	24,315.20
*Disability	3,633,000	1.00	3,633,000.00	0.0668	242,684.40
Household composition (all initial applications)	11,209,223	1.00	11,209,223.00	0.0668	748,776.10
*Questionable Information	584,872	1.00	584,872.00	0.0668	39,069.45
*Student work hours (Not mandatory verification, but to meet exemption per 273.5(b)(5), household must provide supporting documentation on hours worked)	121,688	1.00	121,688	0.0668	8,128.76
Total	11,209,223	7.968	89,318,090.00	0.0668	5,966,448.41

*Based on household participation data from Characteristics of Supplemental Nutrition Assistance Program Households FY 2014 (January 2015) and input from FNS Regional Offices

Previous Household burden: Burden hours associated with mandatory verification were not previously included under SNAP applications for OMB No. 0584-0064. In revising the burden

baseline, we have incorporated the verification as a sub-activity to reflect the burden associated with this step of the process. **The result is an increase of 5,966,448.41 new burden hours.**

Application for SNAP Recertification

Section 273.10(f) of the regulations requires that all households participating in SNAP must be assigned certification periods of a definite length. Under section 273.14(b), to continue participating in SNAP, ongoing households must apply for recertification prior to the end of their current certification periods. The recertification form and process is similar to the initial application and is completed and used in the same manner.

Recertification form

Adjusted Household burden: FNS adjusted the household data to account for participation increase. It has been estimated that a household can complete the recertification application in 15 minutes or 0.2500 hours. This is a reduction of 4.2 minutes from the previous estimate due to efficiencies in the process. The reduction, however, is offset by an increase to participation. **This yields a total burden of 3,654,910.50 (*14,619,642 recertification applications x .2500 hours = 43,654,910.50).** (*FY 2014 National Data Bank – SNAP Total Recertification Applications)

Previous Household burden: The previous burden for this activity was 3,238,956.48 hours (10,121,739 annual applications x .32 hours = 3,238,956.48 hours). The .32 hour time estimate was adjusted to .2500 to accurately capture the 15 minutes estimated for this activity. **The result is a net increase of 415,954.02 burden hours due to increased participation.**

The previously approved burden estimate included “Additional Application for Recertification affected by Final Rule 7 CFR 273.12(a)(5), formerly 7 CFR 273.12(a)(1)(vii).” This burden was a onetime burden associated with some households that were added to simplified reporting due to the 2002 final rule. These same households are now included in the overall SNAP caseload. **This results in a reduction (or avoidance of duplication) of 526,425 burden hours for recertification applications.**

Interview

Adjusted Household burden: Generally, households are able to complete a recertification interview, required under sections 273.14 (b)(3), in less time than the initial interview since the household information is already in the State agency system. FNS estimates that a household interview can be completed in 20 minutes or 0.334 hours. **This yields a total burden of 4,882,960.43 hours for all 53 State agencies (*14,619,642 recertification interviews x .334 hours = 4,882,960.43 hours).** Household participation numbers have been updated to reflect the increase in SNAP participation. (*FY 2014 National Data Bank – SNAP Total Recertification Applications)

Previous Household burden: Not previously proposed since this activity was not included under the SNAP applications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated the interview as a sub-activity to reflect the burden associated with this step of the application process. **The result is an increase of 4,882,960.43 new burden hours.**

Travel Time

SNAP regulations section 273.14(b)(3) require households to have a face-to-face interview for recertification purposes, unless the household is certified for longer than 12 months or the face-to-face interview is waived due to a hardship. FNS has assumed a household burden of 2 hours to account for the time spent traveling to and from the local office to attend an in-office interview.

This assumption is supported under Section 3502.2 of the Paperwork Reduction Act where “the term ‘burden’ means time, effort, or financial resources expended by a person to generate, maintain, or provide information to or for a Federal agency.” Based on this, FNS considered that a 2 hour travel time should be captured as a burden for the household for the face-to-face interview component of the application process. This time estimate is supported by the findings of the *Food Stamp Program Access Study* (see **Sources**) where applicant households reported making an average of 2.4 trips to the local office for filing the application, meeting with caseworkers and providing verification documentation. This study found that on average, households spent 2.2 hours traveling between their homes and the SNAP office.

Household burden: Based on the estimate that on average a face-to-face interview would translate to 2 hours of travel time for a SNAP applicant household, we estimated a total burden of 29,239,284.00 hours for households going through the SNAP recertification process (*14,619,642 all recertification interviews x 2 hours of travel time = 29,239,284.00hours). (*

FY 2014 National Data Bank – SNAP Total Recertification Applications) **The result is an increase of 29,239,284.00 new burden hours.**

Verification

Adjusted Household burden: Based on input received from FNS regional offices on verification times during the recertification process, we estimated that when verified, each item will take 6 minutes or .1002 hours. However, since the verification requirements found in section 273.2(f)(8) (i) of the regulations do not apply to each recertification case, we estimated an average of 10 minutes for the verification process (2,387,767.65 total verification hours / 14,619,642 recertifications = .163 hours or 10 minutes).

Activity	Est. Number of Respondents	Annual Reports or Records Filed	Total Annual Responses	No. Burden Hrs per Response	Estimated Total Burden
Income (if source changed or amount changed by more than \$50)	7,309,821	1	7,309,821.00	0.1002	732,444.06
Social Security Number (if Social Security number is new)	146,196	1	146,196.42	0.1002	14,648.88
Medical expenses (unreported and reoccurring expenses that have changed by more than \$25)	292,393	1	292,392.84	0.1002	29,297.76
Legal obligation to pay child support (if there were changes in obligation to pay)	730,982	1	730,982.10	0.1002	73,244.41
Utility expenses (if has changed by more than \$25)	730,982	1	730,982.10	0.1002	73,244.41
Hours worked (Able-bodied Adults w/out Dependents)	7,309,821	1	7,309,821.00	0.1002	732,444.06
Other information which has changed may be verified (this includes changes in ID, immigration status,	7,309,821	1	7,309,821.00	0.1002	732,444.06

residency, disability, HH composition)					
Total	7,309,821.00	3.260	23,830,016.46	.1002	2,387,767.65

*Burden estimates in this table were determined with input from FNS Regional Offices

Previous Household burden: Burden hours associated with mandatory verification were not previously included under SNAP recertifications for OMB No. 0584-0064. In revising the burden baseline, we have incorporated the verification as a sub-activity to reflect the burden associated with this step of the process. **The result is an increase of 2,387,767.652 new burden hours.**

Periodic Reports

All reporting burdens have been adjusted to account for growth in household participation and change in the number of States offering these reporting systems.

1. Monthly Report

Under section 273.21, households subject to monthly reporting are required to submit reports of their circumstances on a monthly basis. The report requests the information necessary to determine eligibility and benefits of affected households. Households subject to monthly reporting are assigned certification periods of 12 months and submit 11 monthly reports a year plus the application for recertification.

Adjusted Household burden: FNS estimates that a household can review and change information on a monthly report in 7 minutes or .1169 hours. FNS had adjusted the number of reports based on increased household participation. **This yields a total burden of 937,251.36 hours for 2 States with monthly reporting (*8,017,548 reports x .1169 hours = 937,251.36 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous Household burden: The previous burden for this activity was 188,107.92 hours (1,567,566.00 reports x .120 hours =188,107.92 hours). The .120 hour time estimate was adjusted to .1169 to accurately capture the 7 minutes for this activity. **The result is a net increase of 749,143 burden hours due to increased participation.**

2. Quarterly Report

Under section 273.12 (a)(4), State agencies may require households to report changes on a quarterly basis. Since households are not required to submit a separate quarterly report when they submit an application for recertification, the quarterly report is submitted 3 times a year.

Adjusted Household burden: FNS estimates that a household can review and change information on a quarterly report in 8 minutes or 0.1336 hours. FNS had adjusted the number of reports based on increased household participation. **This yields a total burden of 694,721 hours for 1 State with quarterly reporting (*5,200,008 reports x .1336 hours = 694,721 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous Household burden: The previous burden for this activity was 311,792.91 hours (2,398,407 reports x .20 hours = 311,792.91 hours). The .20 hour time estimate was changed to .1336 hours or 8 minutes which is the new time estimate for this activity. **The result is a net increase of 382,928 burden hours due to increased participation.**

3. Simplified or Periodic Report

Section 273.12(a)(5) allows State agencies to establish a simplified reporting (SR) system, under which most households are only required to report when the household's gross monthly income exceeds 130 percent of the Federal poverty level. State agencies have the option of including most households assigned a certification period of at least 4 months in their SR systems; households assigned certification periods greater than 6 months must submit a periodic report by the sixth month. State agencies may opt to require households to submit periodic reports at intervals from every 4 months to every 6 months.

The only other mandatory reporting requirement applies to certain able-bodied adults without dependents (ABAWDs). Under Section 6(o) of the Act and section 273.24 of the SNAP regulations, ABAWDs are limited to 3 months of SNAP eligibility in a 36-month period unless they are employed an average of the 80 hours a month or participating in a qualifying work program. ABAWDs, regardless of their household's reporting system, are required to report changes in their employment status that may affect their eligibility.

Adjusted Household burden: FNS estimates that a household can review and change information on a simplified report in 10 minutes or .167 hours. FNS has adjusted the number of reports to account for increase in household participation. **This yields a total burden of 3,148,210 hours for**

51 States with simplified reporting (*18,851,556 reports x .167 hours = 3,148,210 hours). (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)
Previous Household burden: The previous burden for this activity was 1,402,528.79 hours (10,788,683.00 reports x .130 hours = 1,402,528.79 hours). The .130 hour time estimate was changed to .167 hours or 10 minutes which is the new time estimate for this activity. **The result is a net increase of 1,745,681 burden hours due to increased participation.**

4. Change Report Form

Under section 273.12(a)(1), households not subject to monthly, quarterly reporting or simplified reporting must report most changes in household circumstances within 10 days from the date that the change becomes known to the household.

Adjusted Household burden: FNS estimates that a household can review and change information on a change report in 10 minutes or .167 hours. FNS has adjusted the number of reports to account for increase in household participation. **This yields a total burden of 540,321 hours (*3,235,456 reports x .167 hours = 540,321 hours).** (*9th Edition of State Options Report; FY 2012 National Data Bank – Participating Households Report)

Previous Household burden: The previous burden for this activity was 133,187 hours (1,664,843.00 reports x .080 hours = 133,187 hours). The .080 hour time estimate was changed to .167 hours or 10 minutes which is the new time estimate for this activity. **The result is a net increase of 407,134 burden hours due to increased participation.**

Notices

1. Notice of Missed Interview (NOMI)

Sections 273.2(h)(1)(i)(D) and 273.14(b)(3)(iii) of the regulations apply to the NOMI. The NOMI is issued by State agencies to households that fail to appear for their scheduled initial or recertification interview, or in the case of households subject to telephone interviews, fail to contact the State agency or receive telephone calls initiated by the local office. The household may respond to the notice by requesting that the interview be rescheduled.

Adjusted Household burden: FNS estimates a burden of 1 minute or .0167 hours for a household to read this notice. The number of notices has been adjusted in accordance to the percentage increase (25.4% or .254 estimated increase in initial and recertification applications between FY

2009 and FY 2011) in household applications (number of notices in last IC revision 1,693,242 x .254 = 430,084; 1,693,242 + 430,084 = 2,123,326 notice) to estimate the number of notices. **This yields a total burden of 35,460 hours (2,123,326 notices x .0167 hours = 35,460 hours).**

Previous Household burden: The previous burden for this activity was 33,864.84 hours (1,693,242 notices x .020 hours = 33,864.84 hours). The .020 hour time estimate was adjusted to .0167 to accurately capture the 1 minute for this activity. The increase in burden from the previous estimate results from the revised time estimate and the increase in household participation. **The result is a net increase of 1,595 burden hours.**

2. Notice of Adverse Action (NOAA)

According to section 273.13(a), the NOAA is issued by State agencies to participating households whose benefits will be reduced or terminated as the result of a change in household circumstances.

Adjusted Household burden: FNS estimates a burden of 1 minute or .0167 hours for a household to read this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and FY 2012) in household participation (number of notices in last IC revision 47696 x .735 = 35057; 47696 + 35057 = 82,753 adjusted number of notices). **This yields a total burden of 1,382 hours (82,753 notices x .0167 hours = 1,382 hours).**

Previous Household burden: The previous burden for this activity was 953.92 hours (47,696 notices x .020 hours = 953.92 hours). The .020 hour time estimate was adjusted to .0167 to accurately capture the 1 minute for this activity. **The result is a net increase of 428 burden hours due to increased participation.**

3. Adequate Notice

Sections 273.12(a)(4)(v) and 273.13(b) of the regulations apply to adequate notices. An adequate notice is sent to households by the State agency when the household's benefits are reduced or terminated based on information reported by the household itself. Adequate notices can also be used when mass changes occur. Mass changes are certain changes initiated by the State or Federal government that may affect the entire caseload or significant portions of the caseload.

Adjusted Household burden: FNS estimates a burden of 1 minute or .0167 hours for a household to read this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and FY 2012) in household participation (number of notices in last IC revision 8,430 x .735 = 6196; 8430 + 6196 = 14,626 adjusted number of notices). **This yields a total burden of 244 hours (14,626 notices x .0167 hours = 244 hours).**

Previous Household burden: The previous burden for this activity was 168.60 hours (8,430 notices x .020 hours = 168.60 hours). The .020 hour time estimate was adjusted to .0167 to accurately capture the 1 minute for this activity. **The result is a net increase of 76 burden hours due to increased participation.**

4. Request for Contact (RFC)

According to section 273.12(c)(3)(i), the RFC notice is used to contact the household when the State agency receives information regarding a potential change in a household's eligibility or benefits and such information is not sufficient for the State agency to determine exactly how the household's status would be affected.

Adjusted Household burden: FNS estimates a burden of 2 minutes or .0334 hours for a household to read this notice. The number of notices has been adjusted in accordance to the percentage of increase (73.5% or .735 estimated increase in household participation between FY 2009 and FY 2012) in household participation (number of notices in last IC revision 763,132 x .735 = 560,902; 763,132 + 560,902 = 1,324,034 adjusted number of notices). **This yields a total burden of 44,223 hours (1,324,034 notices x .0334 hours = 44,223 hours).**

Previous Household burden: The previous burden for this activity was 22,894 hours (763,132 notices x .030 hours = 22,894 hours). The .030 hour time estimate was adjusted to .0334 to accurately capture the 2 minute for this activity. **The result is a net increase of 21,329 burden hours due to increased participation.**

Sources

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