

**From:** Wolfgang, Dawn  
**Sent:** Thursday, January 11, 2007 1:53 PM  
**To:** Matsuoka, Karen Y.  
**Cc:** Ruth.Brown@usda.gov; Charlene.Parker@usda.gov; Wilusz, Daniel; Heil, Fran; Giustozzi, Lisa; Wiggins, Terry  
**Subject:** FW: ICR 0584-0299--Quality Control Review Schedule  
**Importance:** High

Karen. Please see our responses below. Thanks. Dawn

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**From:** Matsuoka, Karen Y.  
**Sent:** Tuesday, January 09, 2007 7:43 PM  
**To:** Wolfgang, Dawn  
**Cc:** Ruth.Brown@usda.gov  
**Subject:** ICR 0584-0299--Quality Control Review Schedule  
**Importance:** High

Dawn, OMB has the following comments/questions regarding this ICR. OMB is prepared to approve this ICR on the condition that FNS agrees to make the suggested revisions below. Please ask the program office whether they agree to the terms and if not, provide an explanation. Because the questions/comments are rather straightforward, please have the program office/component respond to these questions by **noon on Friday**. Thanks. – Karen

1. There words “and white” appears to be missing on response category #20 of Question #51. Item #20 should read “(Hispanic or Latino) and (Black or African American) **and White**” We have made these changes and have attached the revised pages.

7 - White

Multiple races reported

- 8 - (American Indian or Alaska Native) and White
- 9 - Asian and White
- 10 - (Black or African American) and White
- 11 - (American Indian or Alaska Native) and (Black or African American)
- 12 - Respondent reported more than one race and does not fit into the above categories (code 8 through 11)

Hispanic or Latino

- 13 - (Hispanic or Latino) and (American Indian or Alaska Native)
- 14 - (Hispanic or Latino) and Asian
- 15 - (Hispanic or Latino) and (Black or African American)
- 16 - (Hispanic or Latino) and (Native Hawaiian or Other Pacific Islander)
- 17 - (Hispanic or Latino) and White

Multiple races reported

- 18 - (Hispanic or Latino) and (American Indian or Alaska Native) and White
- 19 - (Hispanic or Latino) and Asian and White
- 20 - (Hispanic or Latino) and (Black or African American)
- 21 - (Hispanic or Latino) and (American Indian or Alaska Native) and (Black or African American)
- 22 - (Hispanic or Latino) and Respondent reported more than one race and does not fit into the above categories (code 18 through 21)

2. The term "Oriental" is considered offensive to many Asian Americans and should not be used. It should be deleted from item #33. This term has been deleted.

32 - Hispanic  
33 - Asian or Pacific Islander (Oriental)  
34 - American Indian or Alaskan Native  
99 - Unknown

3. FNS will need to have a plan in place for how it will allocate multiple race responses for use in civil rights monitoring and enforcement. Will FNS be implementing the guidance provided in OMB BULLETIN NO. 00-02 (<http://www.whitehouse.gov/omb/bulletins/b00-02.html>)? If not, FNS will need to withdraw this ICR and, upon resubmission, explain what it plans to do, especially regarding those respondents who do not fall into one of the identified multiple race combinations (e.g. those who are coded as "12" or "22" in response to question #51).

The Quality Control system (which covers this burden package) is not the system that FNS uses to collect data for FSP civil rights monitoring and enforcement. This data is collected on the FNS-101 form. Quality Control data collection categories in this area simply mirror already approved categories. The burden package that covers this is OMB # 0584-0025, "Civil Rights Title VI - Collection reports-FNS-191 and FNS-101." This package was approved in March 2006 in conjunction with a final rule "Civil Rights Data Collection" published by FNS on May 18, 2006 that implemented FNS' plan for allocating multiple race responses for use in monitoring and enforcement.

4. The supporting statement (item #10) should not use the term "confidential"—unless FNS has the statutory authority to do so--because this term has a very specific legal definition. Since the Food Stamp Act of 1977 requires only that FNS "safeguard" the respondent information (rather than authorize or require that FNS keep the information "confidential"), terms like "privacy" and "safeguarding" should be used instead of "confidential."

We will use the term "safeguard" in place of "confidential."

5. The supporting statement (item #12 c and d) would indicate that the total annual cost burden to respondents is \$514,436.06. However, the summary of ICR burden lists cost burden as \$0. If the burden is actually \$514,436.06, please change the summary of ICR burden to \$514,436.06.

Per our conversation, the information entered into the Annual Cost Burden is one to be thought as the startup costs. My understanding is this information is capture by ROICS for use for the ICB. You have asked that this entry should reflect the cost to the respondent, which are derived in question 12. I have spoken with the Department and they are requesting guidance from the ROCIS. I will have to get back with you on this when we get an answer.

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**From:** Wolfgang, Dawn  
**Sent:** Friday, January 05, 2007 11:30 AM  
**To:** Matsuoka, Karen Y.  
**Subject:** RE: 0584-0299, Quality Control Review Schedule

In response to your questions:

Yes, there are the only 2 changes to this collection:

- 1) burden hours. The burden hours have increased due to the increase of sample cases. (of course Respondent/Federal costs would increase due to increase as well as salary adjustments).
- 2) question on race. The racial and ethnic data categories had been revised to reflect new standards issued by OMB.

The State agency would look-up the race and ethnic data information that was reported by the participant at the time of application.

Thanks. Dawn

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**From:** Matsuoka, Karen Y.  
**Sent:** Wednesday, December 27, 2006 2:14 PM  
**To:** Matsuoka, Karen Y.; Wolfgang, Dawn  
**Cc:** Minor, Sandra  
**Subject:** RE: 0584-0299, Quality Control Review Schedule

Hi Dawn. I was wondering if you had answers to the following questions from a previous email (see below). Thanks. - Karen

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**From:** Matsuoka, Karen Y.  
**Sent:** Monday, December 11, 2006 4:44 PM  
**To:** 'Wolfgang, Dawn'  
**Cc:** 'Sandra.Minor@fns.usda.gov'  
**Subject:** 0584-0299, Quality Control Review Schedule

Hi Dawn. I was wondering if you could confirm that the **only** 2 revisions being made to this ICR are:

- 1) burden hours
- 2) questions on race

Are there any others?

Also, would the information about race ever come from participant self-report? Would it ever involve a real-time assessment by a state agency of a participant's race? Or would it all be a retroactive assessment by a state agency, where the state agency looks up whatever race information was reported for the participant?

Thanks.

Karen