

Supporting Statement for
Paperwork Reduction Act Submission
for FNS-380-1, Supplemental Nutrition
Assistance Program's Quality Control
Review Schedule
OMB Number 0584-0299

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Terms of Clearance:

1. *Per the 1/11/2007 email, FNS will use the revised race and ethnicity response categories and that this ICR will not be used for civil rights monitoring and enforcement (for which a separate IC exists).*

FNS has been using the revised race and ethnicity response categories and the ICR was and still is not used for civil rights monitoring and enforcement.

2. *Because FNS does not have the statutory authority to provide assurances of confidentiality, FNS will not use the term "confidential" in any materials sent to respondents and will use terms like "data safeguarding" or "privacy" instead.*

FNS has been under the protocol of using data safeguarding or privacy for materials sent to respondents. However, the use of "confidential" may be used by the respondents for their own purposes.

3. *Within 2 months of approval for this ICR, FNS will sort out the technicalities of entering respondent cost burden into ROCIS and will revise the cost estimates through a change request.*

Cost burden has been updated in the following supporting statement.

1. Circumstances Making the Collection of Information Necessary:

State agencies are required to perform Quality Control reviews for the Supplemental Nutrition Assistance Program (SNAP). The FNS-380-1, Quality Control Review Schedule (QCRS), was developed by the Food and Nutrition Service (FNS) for State use to collect both QC data and case characteristics for SNAP and to serve as the comprehensive data entry form for SNAP QC reviews.

The legislative basis for the QC system is in Section 16 of the Food and Nutrition Act of 2008, as amended (the Act). Part 275, Subpart C, of SNAP regulations implements the legislative mandates found in Section 16. The regulatory basis for the QC reporting requirements is provided by 7 CFR 275.14(d) and 7 CFR 275.21.

The legislative basis for the recordkeeping requirements is Section 11(a) of the Act. SNAP regulations, in Section 272.1(f), specify that program records must be retained for a period of three years from the month of origin.

2. Purpose and Use of the Information:

The QCRS collects both QC and case characteristic data. The information needed to complete this form is obtained from SNAP case records and State QC findings.

Data collected is used by FNS and the States to monitor and reduce errors, develop policy strategies, and analyze household characteristic data. In addition, FNS uses this data to determine sanctions and bonus payments based on error rate performance, and to estimate the impact of some program changes to SNAP participation and costs by analyzing the available household characteristic data.

3. Use of Information Technology and Burden Reduction:

In compliance with the E-Government Act, 2002 (E-Gov), FNS has reviewed the entire process for collecting and submitting QC data. However, we are not able to make the entire process electronic at this time. Part of the process allows electronic submission.

The QCRS serves as both the data summary entry form that the QC reviewer completes during each QC review and, subsequently, as the data input document for direct data entry into the

National Information Technology Center (NITC). While the data is manually collected on a paper form from information extracted from a case file, it is 100 percent electronically submitted to via a mainframe or dial up connection to NITC for tabulation and analysis.

Some States have begun to use computerized versions of the worksheets, which provide the information collected on the QCRS. In addition, the FNS contractor for the data collection system has developed, at FNS' request, a computerized version of the worksheet. States are being given the option to continue to use their own systems or the paper version but they are encouraged to use the computerized version provided by FNS. When the FNS computerized versions of the worksheet are used, the information is linked to and creates the QCRS.

4. Efforts to Identify Duplication and Use of Similar Information:

There is no duplication of effort since there is no similar data available.

5. Impacts Small Businesses or Other Small Entities:

The collection of information does not involve any small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently:

Errors made in the certification of benefits would not be effectively monitored or reduced, program policy strategies could not be satisfactorily developed, sanctions and bonus payments based on error rate performance would not be assessed on a timely basis, and information and analysis based on household characteristic data would be incomplete or delayed.

Legal obstacles to reducing the frequency of this collection are contained in SNAP regulations, referenced under Question #1 of this statement.

7. Special Circumstances Relating to the Guideline of 5 CFR 1320.5:

State agencies are required to select and conduct quality control reviews on a monthly, ongoing basis. The results of those reviews are required by regulations at 7 CFR 275.21 to be reported on a monthly, ongoing basis.

There are no other special circumstances that cause the information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency:

Notice of this collection was published in the Federal Register on August 19, 2009 (Volume 74, Number 159, Page 41861). No public comments were received for the 60 day notice.

FNS attends an annual meeting with the National Association of Program Information and Performance Measurement (NAPIPM) organization and the Quality Control Technical Advisory Group (QC TAG) of this organization, an association made up of state SNAP QC Directors, to discuss various QC topics including FNS worksheet 380-1. In our discussions on FNS 380-1 we covered various areas from coding to modernization of the form, however we have not received concern regarding the burden brought on by the use of the form.

9. Explanation of Any Payment or Gift to Respondents:

No payments or gifts are made to respondents.

10. Assurance of Confidentiality Provided to Respondents:

Information gathered from State agency records and interviews during the course of active case reviews are subject to the same safeguards as information obtained from households applying for SNAP benefits. Section 11(e)8 of the Food and Nutrition Act of 2008 mandates that each State agency shall provide "safeguards which limit the use or disclosure of information obtained from applicant households to persons directly connected with the administration or enforcement of the provisions of this Act, regulations issued pursuant to this Act, Federal Assistance programs, or federally assisted State programs...". SNAP regulations at 7 CFR 272.1(c) implement this legislative mandate. The findings of active case reviews, when compiled, do not identify the recipient by name.

11. Justification for Sensitive Questions:

A final rule entitled “Civil Rights Data Collection” was published on May 18, 2006 by FNS. This rule revises the racial and ethnic data collection and reporting for the FSP to comply with the 1997 data collection standards issued by the Office of Management and Budget (OMB) for civil rights data collections. All Federal programs are required to collect racial/ethnic data and information from applicants to permit effective enforcement of the Civil Rights Act. Under the changed procedures applicants will be allowed to choose more than one race and State and local agencies will be required to report tallies for the new racial categories. This rule was effective June 19, 2006.

In accordance with this rule, QC revised item number 51 (Race) of the FNS-380-1, in 2006, to reflect the new racial/ethnic codes. These codes have been updated for our 310 Handbook for further clarification and instruction on their implementation. The FNS-310 Handbook was submitted with OMB control number 0584-0034.

12. Estimates of Hour Burden Including Annualized Hourly Costs:

There are 53 State agencies required to conduct QC reviews of the active cases as part of the Performance Reporting System. The number of active cases that must be selected and reviewed by each State agency during each annual review period is determined based on its size and the State's choice of sampling options. We estimate an annual active case sample of approximately 56,065 cases nationwide for a total of 1057.83 responses per respondent. The number of hours per response will vary depending on the needs of each individual active sample case. We

estimate that State agencies will need an average of 1.05 hours per response for reporting. The annual estimate for reporting is 58,868 hours.

In addition, each of the 53 State agencies is required to maintain records of the Form FNS 380-1 for the recordkeeping requirement. We estimate that the burden is .0236 hours per record for 56,065 records per year and the frequency of responses per respondent is approximately 1057.83. We estimate the annual burden for recordkeeping is 1,322 hours.

We estimate the total annual hour burden of the collection of information is 60,190 hours. This burden was arrived at by adding together the estimated reporting burden and the estimated recordkeeping burden as follows:

Table A. 12.1 Reporting Estimates of Hour Burden

Form Number	No. of Respondents	No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Total Burden Hours
FNS-380-1	53	1,057.83	56,065	1.05	58,868

Table A. 12.2 Record Keeping Burden

Form Number	No. of Record keepers	No. of Records per Record keeper	Est. Total Annual Records	No. Hours per Record to be Kept	Total Burden Hours
FNS-380-1	53	1,057.83	56,065	0.0236	1,323

II Provide estimates of annualized costs to respondents for the hour burden for collections of information, identifying and using the appropriate wage categories

Table A. 12.3 Estimates of Annualized Cost to Respondents

Type of Respondents	Number of Active Sample Cases Per Annum	Average Time Per Response	50 % Hourly Wage Rate	Total Respondent Cost
<u>Reporting Burden</u>				
FNS-380-1 State Agencies	56,065	1.05	\$10.05	\$591,625.91
<u>Recordkeeping Burden</u>				
FNS-380-1 State Agencies	56,065	0.0236	\$10.05	\$13,297.50

The cost to the public is based on \$20.09 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$10.05. Based on these figures the total cost to respondents for the reporting and recordkeeping burdens after FNS reimbursement is \$604,923.41.

To estimate public cost, FNS consulted with the U.S. Department of Labor’s May 2008 Occupational and Wage statistics – 21-0000 Community and Social Services Occupations (<http://www.bls.gov/oes/current/oes210000.htm>).

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers:

There are no capital/start-up or ongoing operation/ maintenance costs associated with this information collection.

14. Annualized Cost to the Federal Government:

The annual cost to the Federal Government to collect and use the data for the FNS-380-1 is estimated at \$266,305.65. This cost includes (1) the cost of printing reporting forms; (2) reviewing

and approving the data, data entry and retrieval; and (3) automated system costs [includes system monitoring and salaries]. These costs are operational costs only.

Worksheet	Printing Costs	Hours Reviewing & Approving	Cost per Hour	Costs Reviewing & Approving	Automated System Costs (incl. Monitoring)	Total Federal Costs
FNS-380-1	\$2,000	2,813	\$10.05	\$28,270.65	\$238,035	\$266,305.65

15. Explain of Program Changes or Adjustments:

The proposed OMB inventory for the reporting and recordkeeping burdens associated with the FNS-380-1 is 60,191 annual burden hours. The difference between the old burden of 61,352 and the new burden of 60,191 is a decrease of 1,161 hours. This difference is a result of a decrease in the number of completed reviews from 39,782 to 38,911.

16. Plans for Tabulation and Publication and Project Time Schedule:

Data tabulation is achieved through established computer programs.

Data included in this collection of information is gathered throughout the entirety of each annual (fiscal year) review period. The data is then published in two separate reports issued on an annual basis.

The first report is SNAP Quality Control Annual Report. This report presents official quality control error rates, and related data for the United States, individual States, Guam, the Virgin Islands and the District of Columbia. Publication of this report occurs approximately within one-year after the end of each annual review period.

The second report is the Characteristics of SNAP Households. This report examines the demographic characteristics and economic circumstances of food stamp recipients and households. An advance report, featuring the highlights of the characteristic data, is published approximately

one-year after the end of each annual review period. A full report is published the following year in our SNAP Quality Control Annual Report.

17. Reason(s) Display of OMB Expiration Date is Inappropriate:

FNS is seeking approval to not display the OMB expiration date on the FNS-380-1. If required to include an expiration date the FNS-380-1 would require modification and would render the existing paper supply an economic loss each time the information collection burden was renewed. At that time the form would have to be revised and a new supply printed.

18. Exceptions to the Certification for Paperwork Reduction Act Submission:

This information collection conforms to the requirements of 5 CFR 1320.9. There are no exceptions to the certification statement.