

Supporting Statement for  
Paperwork Reduction Act  
Submission for Quality Control (QC) reviews  
for the Supplemental Nutrition Assistance  
Program (SNAP).

OMB Number 0584-0034

FNS-245 and FNS-248

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## Table of Contents

### Justification

1	Explanation of Circumstances That Make Collection of Data Necessary.....	3
2	Purpose and Use of the Information.....	4
3	Use of Information Technology to Burden Reduction.....	5
4	Efforts to Identify Duplication and Use of Similar Information.....	5
5	Impacts Small Businesses or Other Small Entities.....	6
6	Consequences of Collecting the Information Less Frequently.....	6
7	Special Circumstance Relating to the Guideline of 5 CFR 1320.5.....	6
8	Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.....	7
9	Explanation of Any Payment or Gift to Respondents.....	7
10	Assurance of Confidentiality Provided to Respondents.....	7
11	Justification for Sensitive Questions.....	8
12	Estimates of Hour Burden Including Annualized Hourly Costs.....	8
13	Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers...11	
14	Annualized Cost to Federal Government.....	11
15	Explanation for Program Changes or Adjustments.....	12
16	Plans for Tabulation and Publication and Project Time Schedule.....	12
17	Reason(s) Display of OMB Expiration Date is Inappropriate.....	13
18	Exceptions to Certification for Paperwork Reduction Act Submission.....	13

### List of Appendices

A	FNS-245	
B	FNS-248	
C	Proposed Rule: “Non- Discretionary Quality Control Provisions of Title IV of Public Law 107-171”	
D	Section 16 of the Food and Nutrition Act of 2008	
E	7 CFR 275.14(d) and 7 CFR 275.21	
F	Section 11 of the Food and Nutrition Act of 2008 Section 11(a) Section 11(e) (8)	
G	Section 272.1(c, f)	
H	Comment Letter from State of Washington Department of Social and Health Services Response Letter to the State of Washington Department of Social and Health Services	
I	FNS 310 Handbook	

**1. Circumstances Making the Collection of Information Necessary:**

State agencies are required to perform Quality Control (QC) reviews for the Supplemental Nutrition Assistance Program (SNAP). The FNS-245 (Negative Case Action Review Schedule), and FNS-248 (Status of Sample Selection and Completion), as revised by the Food and Nutrition Service (FNS), is for state use to collect QC data and information on the status of case reviews. Instructions for completing Form FNS-245 are in Food and Nutrition Service (FNS) Handbook 310.

No significant changes have been made to the Form FNS-245. As of October 1, 2008, the 2008 Farm Bill officially renamed the Federal Food Stamp Program to the Supplemental Nutrition Assistance Program (SNAP), which has been reflected on the FNS-245 worksheet. Since the FNS-248 form will be discontinued when the “Non- Discretionary Quality Control Provisions of Title IV of Public Law 107-171” (Proposed rule published on 9/23/2005) becomes final, we have not made any changes to this form either. Instead, we will continue to only collect four elements of data: Active and Negative Sampling Intervals and Active and Negative Number of Sample Cases Selected. This will be collected via e-technologies available to the state agencies.

The legislative basis for the QC system is Section 16 of the Food and Nutrition Act of 2008. 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 Food and Nutrition Act of 2008. SNAP regulations, in Section 272.1(f), specify that program records are to be retained for a period of three years from the month of origin.

## **2. Purpose and Use of the Information:**

The FNS-245 (Negative Case Action Review Schedule), serves as the data collection form for negative case action reviews. Negative case actions include the denial, termination or suspension of benefits. The form consists of four sections and is used to record data in negative case reviews only. The first section, Case Management Information, is designed for state-related management tool use; the second section, Identifying Information, provides space for information about the household; the third section, Analysis of Review Activity, is for coding compliance with notice requirements; and the fourth section, Description of Variances, provides for the detailed coding of each distinct variance identified in the Review and the recorded reasons for the agency's action. All information will be provided by the household through a SNAP application or through the interview process with an eligibility worker. The state agency will use the collected data to input into the worksheet.

The four elements from the FNS-248 are used by state and Federal agencies to monitor the progress of sample selection and completion to help insure compliance with the requirements of the Act and its regulations.

**3. Use of Information Technology and Burden Reduction:**

In compliance with the E-Government Act, 2002 (E-Gov), FNS has reviewed the QC review and sampling process. We have made every effort to streamline and automate the process.

The FNS-245 serves as both the data summary entry form that the QC reviewer completes during each negative QC case review and, subsequently as the data input document for direct data entry into the Kansas City Computer Center (KCCC). Therefore, while data is manually collected, it is electronically submitted via a virtual network connection into the mainframe's database or through a dial-up service to the KCCC for tabulation and analysis.

The four elements still being collected instead of using the FNS-248 (Status of Sample Selection and Completion) are being collected by an electronic means of choice, determined by each region. This includes sending electronic mail as well as faxes.

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

There is no duplication of effort since there is no similar data available. FNS solely monitors the Quality Control (QC) reviews for the Supplemental Nutrition Assistance Program (SNAP).

**5. Impacts Small Businesses or Other Small Entities:**

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. There are smaller State agencies; however they provide the same data as larger State agencies for this collection.

**6. Consequences of Collecting the Information Less Frequently:**

Invalid denials, terminations or suspensions would not be effectively monitored or related policy improvements identified without information obtained through the negative review. Less frequent reporting would delay the awarding of monetary incentives in which the negative error rate plays a role.

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:**

A notice was published in the Federal Register 74 FR 38578 on August 4, 2009. We received one comment from a State agency indicating they thought the burden should change from 3.0236 hours to 4 hours. The burden associated with this package is based on an overall estimate from 53 state agencies. Therefore, since we only received one comment on the current burden, we do not have sufficient data that would result in an overall national burden change.

**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 information gathered in interviews during the negative case reviews (FNS-245) is subject to the same confidentiality 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...". Section 272.1(c) of SNAP regulations implements this legislative mandate. The findings of negative case reviews, when compiled do not identify the recipient by name.

**11. Justification for Sensitive Questions:**

There are no questions of a sensitive nature.

**12. Estimates of Hour Burden Including Annualized Hourly Costs:**

FNS-245

There are 53 state agencies required to conduct QC reviews of the negative cases as part of the Performance Reporting System. The number of negative 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 negative case sample of 38,911 cases nationwide. We estimate that state agencies will need an average of 3.0236 hours per response for reporting on the FNS-245. This burden totals 117,651 hours per year.

In addition, each of the 53 state agencies is required to maintain 38,964 records of the Form FNS-245 for the recordkeeping requirement. We estimate that the burden is 0.0236 hours per record. This burden totals 919.5 hours per year.

We estimate the total annual hour burden of the reporting and recordkeeping burden for the FNS-245 to be 118,570 hours. The above burdens were arrived at by adding together the estimated reporting burden and the estimated recordkeeping burden.

FNS-248

There are 53 State agencies required to report monthly on four elements: active and negative sample selection and completion. Although the use of form FNS-248 has been discontinued, the State agencies are still required to provide this monthly information. A total of 636 reports are required each year. We estimated it takes .0835 hours to report the required information each month, resulting in an annual burden total of 53.106 hours.

In addition, each of the 53 State agencies is required to maintain the required four elements for the recordkeeping requirement (689 records). We estimate that the burden is 0.0167 hour per record. This burden totals 11.5063 hours per year.

We estimate the total annual hour burden of the reporting and recordkeeping burden for the new collection method instead of using the FNS-248 to be 65 hours. The burden was arrived at by adding together the estimated reporting burden + the estimated recordkeeping burden.

The burdens described above were estimated 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-245	53	734.17	38,911	3.0236	117,651
FNS-248	53	12	636	.0835	53.106
Total Annual Reporting Burden					117,704.106

**Table A. 12.2 Record Keeping Burden**

Form Number	No. of Respondents	No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Total Burden Hours
FNS-245	53	734.17	38,964	.0236	919.55
FNS-248	53	12	689	.0167	11.5063
Total Annual Record Keeping Burden					931.0536

**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 Negative Sample Cases Per Annum	Average Time Per Response	Hourly Wage Rate	Total Respondent Cost
<b>Reporting Burden</b>				
FNS -245 State Agencies	38,911	3.0236	\$10.05	\$1,182,395.56
FNS -248 State Agencies	636	0.0835	\$10.05	\$533.72
Total Annual Reporting Cost to Respondents				\$1,182,929.28
<b>Recordkeeping Burden</b>				
FNS -245 State Agencies	38,964	.0236	\$10.05	\$9,241.48
FNS -248 State Agencies	689	0.0167	\$10.05	\$115.64
Total Annual Record Keeping Cost to Respondents				\$9,357.12

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 \$1,192,286.40

To estimate public cost, FNS consulted 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-245 and FNS 248 is estimated at \$1,361,629.65. 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-245	\$2,000	118,635	\$10.05	\$1,192,261.65	\$169,368	\$1,361,629.65

**15. Explain of Program Changes or Adjustments:**

This is a revision of a currently approved information collection. The proposed burden for the reporting and recordkeeping associated with the FNS-245 and FNS-248 is 118,635 annual burden hours. Due to errors during the last renewal, the current approved burden should have been 121,572 as requested in the 30-Day Notice, 71 FR 10003, published February 28, 2006. However, the Notice of Action dated November 17, 2006, approved only 2,286 hours. Due to frequent staff turnover this error was not discovered until recently. We are requesting 118,635 burden hours which is an increase of 116,347. This increase is due to adjustments due to erroneous data entry in ROCIS.

**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 each annual (fiscal year) review period. The data is then published in the 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 will be done approximately one-year after the end of each annual review period in our SNAP QC Annual Report, which is sent to each region and state electronically through our PartnerWeb application.

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

FNS is seeking approval to not display the OMB expiration date on the FNS -245. If required to include an expiration date the FNS -245 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. By contrast, FNS is not seeking approval for an OMB expiration date on FNS-248 since we are requesting the form be removed from this burden package due to non-use.

**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.