

Supporting Statement for
Paperwork Reduction Act
Submission for FNS-380, Worksheet for
SNAP Quality Control Reviews
OMB Number 0584-0074

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1. Circumstances Making the Collection of Information Necessary:

This is a revision of a currently approved information collection. State agencies are required to perform Quality Control (QC) reviews for the Supplemental Nutrition Assistance Program (SNAP) formerly known as Food Stamp Program. In order to determine the accuracy of SNAP benefits authorized by State agencies, a statistical sample of SNAP cases is selected for review from each State agency. Relevant information from the case record, investigative work and documentation about individual cases is recorded on the form FNS-380, Worksheet for SNAP Quality Control Reviews. This information, along with supporting documentation, is the basis for the determination of the accuracy of the case.

Section 16 of the Food and Nutrition Act of 2008 provides the legislative basis for the operation of the QC system. Part 275, Subpart C, of SNAP regulations implements the legislative mandates found in Section 16. Regulations at 7 CFR 275.1, 275.14(d) and 275.21(a) and (b)(1) provide the regulatory basis for the QC reporting requirements.

Section 11(a) of the Food and Nutrition Act of 2008 provides the legislative basis for the recordkeeping requirements. SNAP regulations, at 7 CFR 272.1(f), specify that program records must be retained for three years from the month of origin. Regulations at 7 CFR 275.4 specifically address record retention requirements for form FNS-380.

Section 4001-4002 of Public Law 110-246 Food, Conservation and Energy Act (2008) renames the Food Stamp Program to “Supplemental Nutrition Assistance Program “ or SNAP.

2. Purpose and Use of the Information:

State agencies are required to perform QC reviews for SNAP. This process includes a face-to-face interview with the household to verify identity and existence and explore other circumstances that affect eligibility and benefit level. The FNS-380 provides a systematic means of aiding the State agency's QC reviewer in analyzing the household case record; planning and carrying out the field investigation; and gathering, comparing, analyzing and evaluating the review data. The face sheet of the form is used to record identifying information about the household and indicate the review findings. The State QC reviewer uses the rest of the form to document and evaluate each step of the field investigation to determine eligibility and amount of payment under FNS approved State agency practice. Information on the worksheet must reflect specifics of the investigation and substantiate the eligibility findings and payment status. The reviewer completes the QC worksheet by entering the appropriate narrative explanation in the spaces provided.

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 via a mainframe or dial up connection to NITC for tabulation and analysis.

Some States have begun to use computerized versions of the worksheet, which provides 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:

FNS would not be able to effectively monitor their QC Review for errors. The Food and Nutrition Act of 2008, as amended, mandates a QC measurement system. The aforementioned Act also requires the Secretary of Agriculture to notify State agencies of their fiscal year error rates within a set time period. The only ways to reduce the burden are to reduce the number of cases subject to review or to reduce the review requirements. The number of cases sampled in this annual review depends on State caseload sizes. The current sample sizes are necessary to maintain the accuracy and precision of the error rates in order to assess liabilities and award bonuses based on performance. In addition, the current review requirements are necessary to maintain the accuracy of individual review findings.

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

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 at FR 74 45802 on September 4, 2009. We received two comments from State agencies (which are included in the package) indicating they thought the burden should change because it was too low and did not reflect the amount of time that their states need to complete these forms. The burden associated with this package is based on an overall estimate from 53 state agencies. Therefore, since we only received two comments on the current burden, we do not have sufficient data that would necessitate an overall change of the national burden.

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. The applications for authorization contain personal identifying information on titled Persons Doing Business with Food and Nutrition Service System of Record Notice (SORN)

USDA/FNS-10. Therefore, the Food and Nutrition Service published such a Privacy Act notice (system of records) March 31, 2000 in the Federal Register Volume 65 pages 17251-52 to specify the uses to be made of the information in this collection. 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:

Social Security numbers are recorded on the FNS-380 for each household member. However, States only collect this information for internal purposes. Some of the internal reasons for recording the Social Security numbers include, but are not limited to, verifying resources, earned income and unearned income (BENDEX, SSA), as well as accessing information from the Department of Motor Vehicles and Child Support agencies, etc. The Social Security numbers are maintained in the State files and are not transmitted to FNS.

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 8.9 hours per response for reporting. The annual estimate for State reporting is 498,978 hours.

In addition to the reports made by State agencies, households receiving SNAP benefits need to report via interview their circumstances to validate their sample month circumstances. There were 56,065 households, each with an estimated reporting time of .5 hours for an annual estimated total of 28,033 burden hours. The total reporting burden for State agencies and households is 527,010.5 hours.

Table A. 12.1 Reporting Estimates of Hour Burden

Affected Public	Form Number	No. of Respondents	No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Total Burden Hours
State Agencies	FNS 380	53	1,057.83	56,065	8.9	498,978
Households	N/A	56,065	1	56,065	.5	28,033
Total Burden		56,118		112,130		527,010.5

Each of the 53 State agencies is also 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.

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	53	1,057.83	56,065	0.0236	1,323

Our estimated the total annual hour burden:

- SA reporting 498,978 + SA recordkeeping 1,323 = 500,301
- Household reporting =28,032

Total reporting and recordkeeping for SA and Household is 528,333 burden hours.

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 % SS Hourly Wage Rate or U.S, Minimum wage	Total Respondent Cost
Reporting Burden				
FNS-380 State Agencies	56,065	8.9	\$10.05	\$5,014,733.93
Households	56,065	.50	\$5.85	\$163,990.13
Recordkeeping Burden				
FNS-380 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 \$5,028,031.43. In addition, the cost to households is based on the U.S. minimum wage of \$5.85 per hour. Based on this rate, the total burden cost to households is \$163,990.13 for reporting.

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>). The estimate for household reporting cost was estimated by using the U.S. Department of Labor's minimum wage requirement for May 2008, found at <http://www.dol.gov/elaws/faq/esa/flsa/001.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 is estimated at \$5,014,733.93. This cost includes the government's share for (1) printing reporting forms; (2) the hours the states took to review and approving the data. These costs are operational costs only.

Worksheet	Printing Costs	Hours Reviewing & Approving	Cost per	Costs Reviewing & Approving	Automated System Costs	Total Federal Costs
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			Hour		(incl. Monitoring)	
FNS-380	\$2,000	498,978.5	\$10.05	0	0	\$5,014,733.93

15. Explain of Program Changes or Adjustments:

This is a revision of a currently approved information collection. The proposed OMB inventory for the reporting and recordkeeping burdens associated with this collection is 528,333.5 annual burden hours. The difference between the old burden of 542,887 and the new burden of 528,333.5 is a decrease of 14,553.5 hours. This difference is a result of a decrease in the number of completed reviews from household participants from 57,146 to 56,065. This reduction in response time is due to program changes.

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

There are no plans for tabulation and publication.

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. If required to include an expiration date the form 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.