

Supporting Statement for
Paperwork Reduction Act Submission
for FNS-380, Worksheet for the
Supplemental Nutrition Assistance
Program Quality Control Reviews
OMB Number 0584-0074

Prepared by:

Tiffany Wilkinson

U.S. Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive, Room 822

Alexandria, VA 22302

703-305-2805

Tiffany.Wilkinson@fns.usda.gov

Table of Contents

Part A- Justification

1.	Explanation of Circumstances That Make Collection of Data Necessary	3
2.	Purpose and Use of the Information	3
3.	Use of Information Technology to Burden Reduction	4
4.	Efforts to Identify Duplication and Use of Similar Information	5
5.	Impacts Small Businesses or Other Small Entities	5
6.	Consequences of Collecting the Information Less Frequently	5
7.	6	7
8.	Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency	6
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	12
18.	Exceptions to Certification for Paperwork Reduction Act Submission	12

List of Appendices

- A. FNS-380
- B. FNS 380 Coding Instructions from FNS 310 HB

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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). 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.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection:

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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden:

In compliance with the E-Government Act, 2002 (E-Gov), FNS has reviewed the entire process for collecting and submitting QC data. FNS is actively working with contractors to finalize an electronic submission system for State Agencies to use for both data summary entry that the QC reviewer completes during each QC review; and subsequently as the data input for direct entry into the National Information Technology Center (NITC). The screen shots provided are an example of how the system appears as it's being built, the touch and feel of the system may differ in the final product, but the data elements collected are identical to those on the FNS 380 as well as the instructions. The electronic web-based system will allow users to use a variety of drop down menus, radial buttons, and self populate related

data. This may have an impact on the burden time; however, we cannot determine this until the system is launched with active end-users.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above:

There is no duplication of effort since there is no similar data available. FNS solely monitors QC review system for errors for SNAP benefits cases authorized by State agencies.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden:

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. None (0) of our States Agencies are considered small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden:

If this collection were not conducted or was conducted less frequently, FNS would not be able to monitor effectively its QC review system 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. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

Notice of this collection was published in the Federal Register on January 16, 2013 (Volume 78, Number 11, Page 3390). No public comments were received for the 60 day notice.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported:

FNS attends an annual meeting with the National Association of Program Information and Performance Measurement (NAPIPM) organization and holds calls regularly with 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.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees:

No payments or gifts are made to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy:

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. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the

specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent:

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. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories**

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 51,959 cases nationwide for a total of 980.3585 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 462,435.1 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 51,959 households, each with an estimated reporting time of .5 hours for an annual estimated total of 25,979.5

burden hours. The total reporting burden for State agencies and households is 488,414.6 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	980.3585	51,959	8.9	462,435.1
Households	N/A	51,959	1	51,959	.5	25,979.5
Total Burden		52,012		103,918	9.4	488,414.6

Each of the 53 State agencies are also required to maintain records of the Form FNS 380 for the recordkeeping requirement. We estimate that the burden is .0236 hours per record for 51,959 records per year and the frequency of responses per respondent is approximately 980.3585. We estimate the annual burden for recordkeeping is 1,226.2 hours.

Table A. 12.2 Record Keeping Burden State Agencies:

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	980.3585	51,959	0.0236	1226.2

Table A. 12.3 Reporting & Record Keeping Burden

Our estimate of the total annual hour burden for State Agencies (SA) & Individual/Households (IH):

No. of Record Respondents	Form Number	No. of Records Response	Est. Total Annual Records	No. Hours per Record to be Kept	Total Burden Hours
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SA Reporting FNS-380	53	980.3585	51,959	8.9	462,435.1
SA Recordkeeping FNS-380	53	980.3585	51,959	0.0236	1,226.2
SUBTOTAL SA ANNUAL BURDEN FOR REPORTING & RECORDKEEPING	53	---	103,918	---	463,661.3
Individual/ Households	51,959	1	51,959	.5	25,979.5
GRAND TOTAL BURDEN	5,2012	----	155,877	---	489,640.8

- SA reporting 462,435.1 + SA recordkeeping 1,226.2 = 463,661.3 + Household reporting =25,979.5

Total reporting and recordkeeping for SA and Household is 489,640.8 burden hours.

Table A. 12.4 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	Est. Total Respondent Cost
Reporting Burden				
FNS-380 State Agencies	51,959	8.9	\$10.535	\$4,871,753.78
Households	51,959	.50	\$7.25	\$188,351.38
Recordkeeping Burden				
FNS-380 State Agencies	51,959	0.0236	\$10.535	\$12,918.36

The cost to the public is based on \$21.07 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$10.535. Based on these figures the total cost to respondents for the reporting and recordkeeping burdens after FNS reimbursement is \$5,073,023.52. In addition, the cost to

households is based on the U.S. minimum wage of \$7.25 per hour. Based on this rate, the total estimated burden cost to households is \$188,351.38 for reporting.

To estimate public cost, FNS consulted with the U.S. Department of Labor's May 2011 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 2011, found at

<http://www.dol.gov/elaws/faq/esa/flsa/001.htm>.

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component:

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

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information:

The annual cost to the Federal Government to collect and use the data for the FNS-380 is estimated at \$5,282,065.78. This cost includes the government's share for (1) printing reporting forms; (2) the hours the states took to review and approve the data. These costs are operational costs only.

Worksheet	Printing Costs	Hours Reviewing & Approving	Cost per Hour	Est Costs Reviewing & Approving	Automated System Costs (incl. Monitoring)	Total Federal Costs
FNS-380	\$2,000	462,435.1	\$10.535	\$4,871, 753.78	\$408,312	\$5,282,065.78

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-i

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 approximately 489,640.8 annual burden hours. The difference between the old burden of 528,333 and the new burden of 489,640.8 is a decrease of 38,692 hours. This also resulted in a -4,106 decrease in the number of overall completed case reviews of household participants from 56,065 in FY 2007 to 51,959 in FY for reporting.

There is an additional adjustment. During the previous submission, annual responses for recordkeeping were not taken into account when entering this request into ROCIS. Subsequently, there is an increase of 47,853 responses for recordkeeping.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication:

There are no plans for tabulation and publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be 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. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act.":

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