

Supporting Statement for
Paperwork Reduction Act
Submission for Quality Control (QC) reviews
for the Supplemental Nutrition Assistance
Program (SNAP) titled “Case and Procedural
Case Action Review Schedule”.

OMB Number 0584-0034

FNS-245

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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 collection; we are requesting a name change for this information collection from “Negative QC Review Schedule” to “Case and Procedural Case Action Review Schedule”. We are also seeking the three-year renewal at this time. State agencies are required to perform Quality Control (QC) reviews for the Supplemental Nutrition Assistance Program (SNAP). The FNS-245 (Case and Procedural Case Action Review Schedule), is for State use to collect QC data and information on the status of case and procedural reviews. Instructions for completing Form FNS-245 are in the Food and Nutrition Service (FNS) Handbook 310, which is provided in this information collection request.

New QC procedures for Negative cases (now referred to as Case and Procedural cases) went into effect for the 2012 QC review year. SNAP has determined the form associated with the reporting of these cases needed to be updated to reflect the new name and reorganized in order to not only streamline the data elements being reported, but to also add nine data elements to more effectively and efficiently record what is now being reviewed.

The legislative basis for the QC system is Section 16 of the Food and Nutrition Act of 2008, hereafter referred to as “the Act”. Part 275, Subpart C, of SNAP regulations implements the

legislative mandates found in the Act. 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 are to be retained for a period of three years from the date of fiscal or administrative closure.

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:

The FNS-245 serves as the data collection form for case and procedural case action reviews. Case and Procedural cases include the denial, termination or suspension of benefits. The form consists of four sections and is used to record data in case and procedural case action 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. 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 previously provided by the household through a SNAP application or through the interview process with an eligibility worker. The State agency will use the extant collected data to input into the worksheet.

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 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 case and procedural case action review and, subsequently as the data input document for direct data entry into the SNAP Quality Control System (SNAPQCS). Therefore, while data is manually collected by State Agencies, it is electronically submitted via a virtual network connection to a web-based database for tabulation and analysis.

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 the QC reviews for (SNAP) to ensure program integrity.

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. There are smaller State agencies; however they provide the same data as larger State agencies for this collection.

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:

FNS would not be able to effectively monitor invalid denials, terminations or suspensions; nor would we be able to identify related policy improvements without information obtained through the case and procedural case review.

Legal obstacles to reducing the frequency of this collection are contained in SNAP regulations at 7 CFR 275.14(d) and 7 CFR 275.21.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
State agencies are required to select, conduct, and report on QC reviews on a monthly, ongoing basis.
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
not applicable
- **requiring respondents to submit more than an original and two copies of any document;**

not applicable

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

SNAP regulations, in Section 272.1(f), specify that program records are to be retained for a period of three years from the date of fiscal or administrative closure. The date of an administrative closure could cause the case to be kept more than three years after the initial case review.

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
not applicable
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
not applicable
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
not applicable
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

not applicable

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, 2014 (Volume 79, Number 11, Page 2815). We received 2 comments. One commenter agreed with the

reorganization of the form and was satisfied with the changes made, while the other commenter was not only concerned about the form's usability after its reorganization, but believed some of the information being collected was repetitive. Both commenters were concerned the learning curve to get used to the new form would create further burden for its users.

After analyzing the questions, FNS informed both commenters that we understood there would be a learning curve with the new form, but that the form itself should pose no additional burden once fully trained. In addition, we addressed the questions regarding the reorganization and explained how the items in question were not redundant and that some of the items had not changed from the form's previous version. Overall FNS plans to move forward with the new version as proposed.

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 245. In our discussions on the FNS 245 we covered various areas from coding to modernization of the form;

however, aside from the two 60 day notice comments, we did not received additional comments regarding the changes for this collection.

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 information gathered in interviews during case action reviews (FNS-245) are subject to the same privacy safeguards as information obtained from households applying for SNAP benefits. Section 11(e)(8) of the Act 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. 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:

There are no questions of a sensitive nature on the FNS 245.

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 negative cases as part of the Performance Reporting System. The number of case and procedural 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 also estimate there will be approximately 775.1887 total annual responses per State agency and an annual case and procedural case sample of 41,085 cases nationwide. In addition, we estimate that state agencies will need an average of 2.9406 hours per response for reporting on the FNS-245. This burden totals approximately 120,814.5542 hours per year.

In addition, each of the 53 state agencies are required to maintain records of the Form FNS-245 for the recordkeeping requirement. FNS estimates 775.1887 total annual records will be maintained by state agencies. We estimate the burden is 0.0236 hours per record. This record keeping burden totals approximately 969.6060 hours per year.

We estimate the total annual reporting and recordkeeping burden for the FNS-245 to be 121,784.1602 hours. The above burdens were arrived at by adding together the estimated reporting burden and the estimated recordkeeping burden.

The burden described above was estimated as follows:

Table A. 12.1 Reporting Estimates of Hour Burden

Form Number	No. of Respondents	Est. No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Estimated Total Burden Hours
FNS-245	53.00	775.1887	41,085	2.9406	120,814.5542

Table A. 12.2 Record Keeping Burden

Form Number	No. of Respondents	Est. No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Estimated Total Burden Hours
FNS-245	53.00	775.1887	41,085	0.0236	969.6060

Table A. 12.3 Combined Reporting and Recordkeeping Burden Hours

Reporting Burden						
Affected Public	Requirement	Estimated # of Respondents	Responses Annually per Respondent	Total Annual Responses (Col. bxc)	Estimated Avg. # of Hours per Response	Estimated Total Hours (Col. dx)
State Agencies Reporting	FNS-245	53	775.1887	41,085	2.9406	120,814.5542
State Agencies Recordkeeping		53	775.1887	41,085	0.0236	969.6060
Grand Total Reporting & Recordkeeping Burden Hours		53	----	82,170	----	121,784.1602

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. 12.4 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
FNS -245 State Agencies	41,085	2.9406	\$13.19	\$1,593,543.93
FNS -245 State Agencies	41,085	0.0236	\$13.19	\$12,789.10

The cost to the public is based on \$26.38 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$13.19. Based on these figures the estimated total cost to respondents for the reporting and recordkeeping burdens after FNS reimbursement is \$1,606,333.03.

To estimate public cost, FNS consulted with the U.S. Department of Labor's May 2012 Occupational and Wage statistics – 21-1029 Community and Social Services Occupations (<http://www.bls.gov/oes/current/oes211029.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 costs for this collection, but there is \$150,000 in ongoing operation/maintenance costs annually 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-245 is estimated at \$2,698,397.53 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.

Requirement Regional Offices	Total Responses Per Year	Hrs Per Response	Regional Office Respondents (46) per Response	Regional Ofc Salary GS11/2 2012	Regional Office Salary Costs
Reviewing/ Approving	12,215	2.9406	265.5434	\$24.90	\$894,393.78

Requirement National Office	Total Responses Per Year	Hrs Per Response	N.O Respondents (1) per Response	N.O 2012 Salary GS 12/6 base	National Office Salary Costs
Reviewing/ Approving	461	2.9406	1	\$33.69	\$45,670.72

Worksheet	Printing Costs	Federal Salary Costs from Reviewing/ Approving cases	Federal Share of SA's costs	Automated System Costs (incl. Monitoring)	Total Federal Costs
FNS-245	\$2,000	\$940,064.50	1,606,333.03	\$150,000	\$2,698,397.53

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 total Case and Procedural SNAP case selection increased from 40,775 Negative cases in FY 2010 to 41,085 case and procedural case action cases in FY 2012. The overall reporting and recordkeeping burden associated with the completion of the FNS-245 has increased from 120,812 hours to 121,784 hours the number of responses increased from 40,775 in FY 2010 to 41,085 cases in FY 2012.. This resulted in program adjustment of approximately 972 burden hours caused by an increase in the number of cases.

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

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 QC Annual Report. This report presents official QC error rates, and related data for the United States, individual states, Guam, the Virgin Islands and the District of Columbia. The SNAP QC Annual Report will be published approximately one year after the end of each annual review period and is sent to each region and state electronically through our PartnerWeb application.

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 will be displaying the expiration date on the new form.

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.