

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0299:

FNS-380-1, Supplemental Nutrition Assistance Program's Quality Control Review

Schedule

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7 CFR Part 275

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A1. 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. State agencies are required to perform Quality Control (QC) 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.

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The QCRS collects both QC and case characteristic data. The information needed to complete form FNS-380-1 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.

A3. Use of information technology and burden reduction.

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. 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 FNS via the SNAP Quality Control Automated System, SNAPQCS, through upload or by direct data entry.

A4. Efforts to identify duplication.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), 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

A6. Consequences of collecting the information less frequently.

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.

This is an ongoing data collection. Without this collection, FNS would not be able to ensure integrity. 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.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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;**

Requiring respondents to submit more than an original and two copies of any document;

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;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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**
- **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.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the

Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden.

Notice of this collection was published in the Federal Register on October 15, 2015 (Vol. 80, No. 199, Pg. 62012). We received one comment included in this collection; Appendix C. The commenter made no reference to the notice in their comment, they simply wrote, "thank you" for the information. Since their comment was neither in favor of nor in opposition of the notice, the comment was posted to regweb.org for the public and no response was sent from FNS.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FNS attends an annual meeting regularly 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 any of the QC worksheets.

A9. Explain any decisions to provide any payment or gift to respondents.

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.

A10. Assurances of confidentiality provided to respondents.

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. 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.

A11. Justification for any questions of a sensitive nature.

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.

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 SNAP 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 is approved under OMB control number 0584-0034, expiration date 10/31/2017.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. 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.

The overall burden request for this data collection is 59,450.33 burden hours. 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 55,067 cases nationwide for a total of 1,039 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 1.056 hours per response for reporting. The annual estimate for reporting is 58,150.75 hours.

In addition, each of the 53 State agencies are 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 55,067 records per year and the frequency of responses per respondent is approximately 1,039 records to keep. We estimate the annual burden for recordkeeping is 1,299.58 hours.

We estimate the total annual hour burden of the collection of information is 59,450.33 hours. This burden was arrived at by adding together the estimated reporting burden and the estimated recordkeeping burden as follows:

Table A. 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	Est. Total Burden Hours
FNS-380-1	53	1039	55,067	1.056	58,150.75

Table A. 2 Record Keeping Burden

Form Number	No. of Record keepers	Est. No. of Records per Record keeper	Est. Total Annual Records	No. Hours per Record to be Kept	Est. Total Burden Hours
FNS-380-1	53	1039	55,067	0.0236	1,299.58

B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate 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
Reporting Burden				
FNS-380-1 State Agencies	55,067	1.056	\$14.04	\$814,692.04
Recordkeeping Burden				
FNS-380-1	55,067	0.0236	\$14.04	\$18,246.12

State Agencies				
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The overall cost for this collection without 50 percent reimbursement is estimated at \$1,665,876.30. The cost for this data collection is estimated at \$832,938.16 with the 50% reimbursement for FNS. The cost to the public is based on \$28.08 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$14.04. To estimate public cost, FNS consulted with the U.S. Department of Labor’s mean hourly wage for May of 2014; Occupational and Wage statistics – 21-1029 Social Workers, All Other (<http://www.bls.gov/oes/current/oes211029.htm>).

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 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 to respondents or recordkeepers associated with this information collection.

A14. Provide estimates of annualized cost to the Federal government.

Provide estimates of annualized cost to the Federal government. 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-380-1 is estimated to be \$1,081,304.14. This cost includes (1) the cost of printing reporting forms; (2) reviewing and approving the data, data entry and retrieval [includes 50% mean wage per hour]; and (3) automated system costs [includes system monitoring and salaries]. These costs are operational costs only.

Worksheet	Printing Costs	Est. Costs Reviewing & Approving	Automated System Costs (incl. Monitoring)	Est. Total Federal Costs
FNS-380-1	\$2,000	\$832,938.16	\$246,366	\$1,081,304.14

A15. Explanation of program changes or adjustments.

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 data collection. The current burden inventory is 64,542.80. The revised OMB inventory for the reporting and recordkeeping burdens associated with the FNS-380-1 is 59,450.33 annual burden hours. This program adjustment reflects a decrease of 5,092.47 hours. This difference is primarily a result of the decrease in the overall active household caseload sample reported where the number of completed reviews went down from 59,831 to 55,067 since our last collection revision. The current total number of responses is 119,662 for reporting and recordkeeping and the revised total annual responses are 110,134. This program adjustment reflects a decrease of 9,528 responses which is also due to the same active household caseload samples.

A16. Plans for tabulation, and publication and project time schedule.

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 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 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.

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.

A17. Displaying the OMB Approval Expiration Date.

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 not seeking approval to not display the OMB expiration date on the FNS-380-1.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" 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.