

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0074:

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

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7 CFR Part 275

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Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....3
A2. PURPOSE AND USE OF THE INFORMATION.....3
A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....4
A4. EFFORTS TO IDENTIFY DUPLICATION.....5
A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....5
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....6
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....6
A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....7
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....8
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....8
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....9
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....9
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....12
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....13
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....13
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....14
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....14
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....14

Appendices

- A. FNS-380 and Coding Instructions from FNS 310 HB
- B. FNS 310 Handbook
- C. FNS QC Policy Memos (amending FNS 310 Handbook)
- D. OMB 0584-0074- 60 Day Notice
- E. Food and Nutrition Act of 2008, as amended (QC Sections pgs. 96-102)
- F. Screen Shots of the automated FNS 380 in SNAPQCS
- G. SNAPQCS Privacy Impact Analysis (PIA)

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 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 (Appendix A). 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 (Appendix E). 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.

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.

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.

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 Quality Control Review System (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.

Some States have begun to use computerized versions of the worksheet, which provides the information collected on the QCRS (Appendix F). 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.

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. FNS solely monitors QC review system for errors for SNAP benefits cases authorized by State agencies.

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.

There are no small business involved with this data collection. FNS has determined that the

requirements for this information collection do not adversely impact small businesses or other small entities. Smaller State agencies 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. 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.

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 March 1, 2016 (Vol. 81, No. 40, Pg. 10567). We received no comments.

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 with the National Association of Program Information and Performance Measurement (NAPIPM) organization, most recently August 10-13, 2015, 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.

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 household 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.

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.

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 affected public for this data collection is 53 State Agencies and 55,067 Individuals/Households.

The total annual burden estimates for this data collection is 518,930 burden hours and 165,203 total annual responses. 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 households 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 8.9 hours per response for reporting. The annual estimate for State reporting is 490,096.30 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. 55,067 households will be interviewed for QC at least once annually, each with an estimated reporting time of .5 hours for an annual estimated total of 27,533.5 burden hours. The total reporting burden for State agencies and households is 517,629.80 hours and the total annually responses for reporting is 110,134.

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 55,067

records per year and the frequency of responses per respondent is approximately 1,039. We estimate the annual burden for recordkeeping is 1,299.59 hours and the total annual responses for recordkeeping is 55,067.

We estimate the total annual hour burden of the collection (reporting and recordkeeping) of information is 518,930 hours and the total annual response (reporting and recordkeeping) is 165,203. 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 State Agencies	53	1039	55,067	8.9	490,096.30
FNS-380 Households	55,067	1	55,067	.5	27,533.50
TOTAL REPORTING BURDEN	55,120	1.9980769	110,134	4.7	517,629.80

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 State Agencies	53	1039	55,067	0.0236	1299.5812

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	Average Time Per Response	50 % Hourly Wage Rate	Total Respondent Cost
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	Cases Per Annum			
Reporting Burden				
FNS-380 State Agencies	55,067	8.9	\$14.075	\$6,898,105.42
FNS-380 Households	55,067	.5	\$7.25	\$199,617.88
Recordkeeping Burden				
FNS-380 State Agencies	55,067	0.0236	\$14.075	\$18,291.61

The cost for this data collection is estimated at \$7,116,014.91. The cost to the public is based on \$28.15 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$14.075. To estimate public cost, FNS consulted with the U.S. Department of Labor’s mean hourly wage for May of 2015; Occupational and Wage statistics – 21-1029 Social Workers, All Other (<http://www.bls.gov/oes/current/oes211029.htm>). 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 \$199,617.88 for reporting. The estimate for household reporting cost was estimated by using the U.S. Department of Labor’s most recent Federal minimum wage found at <http://www.dol.gov/elaws/faq/esa/flsa/001.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 is estimated to be \$8,646,940.91. This cost includes (1) the cost of printing reporting forms; (2) the Federal share [50%] of the State’s burden as well as the cost for 2 Federal staff years [\$180,808] to draft, review and approve the data, and data entry; and (3) automated system costs [includes system monitoring and salaries]. These costs are operational costs only.

Worksheet	Printing Costs	Est. Costs Drafting, Reviewing & Approving	Automated System Costs (incl. Monitoring)	Est. Total Federal Costs
FNS-380	\$2,000	\$7,296,822.91	\$1,348,118	\$8,646,940.91

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 489,641 burden hours and 155,877 responses. The revised OMB inventory for the reporting and recordkeeping burdens associated with the FNS-380 is approximately 518,930 annual burden hours and 165,203 responses. This program adjustment reflects an increase of approximately 29,289 hours and 9,324 responses. This difference is primarily a result of the increase in the overall active household caseload sample reported where the number of completed reviews went up from 51,959 to 55,067 since our last collection revision.

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.

There are no plans for tabulation and publication.

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.

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.