

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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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 request to reinstate an expired information collection with change. Due to statute, FNS is still legally required to collection this data and thereby continuing to collection in violation of the Paperwork Reduction Act. 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) using the guidance in FNS 210 Handbook (Appendix B). 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, as amended, provides the legislative basis for the operation of the QC system (Appendix C). 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, as amended, 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 (e.g., names, social security numbers, birthdates, ages and address) 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. Please see attached burden narrative for details. Appendix I.

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. 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 at <https://snapqcs.fns.usda.gov/>.

Some States have begun to use computerized versions of the worksheet, which provides the information collected on the QCRS (Appendix D). 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 mandatory data collection which is being collected from States in violation of the Paperwork Reduction Act. Additionally, this data collection is required for individual and households to obtain or retain benefits. If this collection was not conducted or was conducted less frequently, FNS would not be able to monitor effectively its QC review system for errors or ensure program integrity. 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. Current sample sizes are necessary to maintain the accuracy and precision of the error rates in order to assess liabilities. 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, as discussed in 7 CFR 275.11(c).

- **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 June 17, 2019 (Vol. 84, No. 116, Pg. 28003 - 28004). We received fifteen total comments in response to this notice, however only seven commenters provided a method for FNS to respond and are included as attachments to this statement (See appendices G1-G7). None of the comments received for the 60 day notice were related to practical utility, quality, and/or clarity of the information, the accuracy of an agency's estimate of the burden, or recommendations to change the burden or the cost. The public comments we received ranged from concerns about the use of assets, including emergency funds, in determining eligibility for SNAP benefits, to the need for more accountability in the way in which SNAP benefits are used, to the importance of SNAP benefits to unemployed individuals and individuals with low wage jobs. All comments received are posted on fdms.gov for the public to see.

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 annual meetings with the National Association of Program Information and Performance Measurement organization, most recently August 5-8, 2019, 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 from 7 FNS regions. FNS sought feedback from members of the QC TAG from all 7 regions including, but not limited to Samantha Fettig (336-634-5722) and Pat Moore (919-527-6282) of the State of North Carolina, Denise Lamere, (quality@dhhs.nh.gov) Administrator for the Bureau of Improvement and Integrity for the Quality Assurance and Federal Eligibility Review Unit for the State of New Hampshire, and Joni Hicks (804 663-5532), Acting Quality Assurance Program Manager for the Virginia Department of Social Services. While FNS requested feedback from State agencies, FNS only received comments from two State agencies regarding the practical utility, quality, and/or clarity of the information, the accuracy of an agency's estimate of the burden, or recommendations to change the burden. Both State agencies offered such feedback. In summary, they thought the estimated time for completing the FNS 380 was too low, though their estimates were not too different from FNS'. FNS was unable to incorporate their recommendations as some included items like travel, which FNS does not include for filling out the form, and supervisory reviews, which FNS does not include in the filling of the form, but rather the total allotment of time FNS allows for completing cases. Comments and responses are in the appendices (H1 and H2).

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.

The FNS 380 will contain a Privacy Act Statement and the data is be stored in a secured database. The applications for authorization contain personal identifying information on individuals doing business with Food and Nutrition Service. Therefore, the Food and Nutrition Service published a Privacy Act notice {(system of records notice (SORNs)} FNS-5 titled Privacy Act: Revision of Privacy Act Systems of Records, December 27, 2010 in the Federal Register Volume 75 pages 81205-81209 (Appendix F) to specify the uses to be made of the

information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases.

Section 7(b) of the Privacy Act of 1974 (P.L 93-579, U.S.C. 552a note) requires that Federal, State or local government agencies which request individuals to disclose their social security number be informed (1) whether that disclosure is mandatory or voluntary, (2) by what statutory authority or other authority each number is solicited, and (3) what uses will be made of the number. The Department's prototype Privacy Act Statement which fulfills these criteria has been incorporated into section 245.6(a)(1) and 245.6a(a)(2) of the regulations governing free and reduced price eligibility and has been included in the Department's prototype free and reduced price application.

Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Various methods of computer security limit access to records in automated databases (such as file encryption/locking tool like [Icon Lock-iT XP](#) to lock down files and strongly encrypt sensitive documents using the industry standard of AES as the encryption algorithm, to prevent unauthorized user, we have implement a [firewall](#) for your network). Paper records are segregated and physically secured in locked cabinets inside a secure building that requires Federal ID for entry. Additionally, files are maintained in a secure office that requires an electronic key card to enter.

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.

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 45,497 households nationwide for an estimated total of 4,292 responses per state agency 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 8.4 hours

to complete their responses for reporting on the FNS 380. The annual estimate for State agency reporting is 227,484 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. Each of the 45,497 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 22,748.50 burden hours. The total estimated reporting burden for State agencies and households is 404,922 hours and the total annual responses for reporting is approximately 272,981.

Each of the 53 State agencies are required to maintain records of the Form FNS-380 for the recordkeeping requirement. We estimate that the burden is .0236 hours per record for 45,497 records per year and the frequency of responses per respondent is approximately 858.43. We estimate the annual burden for recordkeeping is 1,073.73 hours and the total annual responses for recordkeeping is 45,497.

We estimate the total annual hour burden of the collection (reporting and recordkeeping) of information is 405,995 hours and the total annual response (reporting and recordkeeping) is 318,478. This burden was arrived at by adding together the estimated reporting burden and the estimated recordkeeping burden as follows:

Table A. 12.1 Reporting Estimates of Hour Burden

Reporting Burden

Reporting Burden for State Agencies FNS 380, OMB 0584-0074							
Reg. Section	Affected Public	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	Total Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours
275.12 (b)	State Agencies	Household Case Record Review	53	858.43	45,496.79	3	136,490.37
275.12 (c)	State Agencies	Field investigation	53	858.43	45,496.79	3.5	159,238.77
275.12 (c)(1)	State Agencies	Personal interviews	53	858.43	45,496.79	0.5	22,748.40
275.12 (b)	State Agencies	Variance identification	53	858.43	45,496.79	0.9	40,947.11
275.12 (b)	State Agencies	Error analysis	53	858.43	45,496.79	0.5	22,748.40
State Agencies (SA) Reporting Burden - Subtotals			53	4,292.15	227,483.95	1.68	382,173.04
Reporting Burden for Individuals/Households FNS 380, OMB 0584-0074							
275.12 (c)(1)	Individual/Households	Personal interviews	45,497	1	45,497	0.5	22,748.50
Individuals/Households (I/H) Reporting Burden - Subtotals			45,497	1	45,497	0.5	22,748.50
Grand Totals Reporting Burden			45,550.00	5.99	272,980.95	1.78	404,921.54

Table A. 12.2 Record Keeping Burden

Record Keeping Burden							
Recordkeeping Burden for State Agencies FNS 380, OMB 0584-0074							
Reg. Section	Affected Public	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	Total Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours
275.4	State Agencies	Record Retention	53	858.43	45,497	0.0236	1,073.73
Overall Grand Total Reporting SA & I/H and Recordkeeping for SA			45,550.00	6.99	318,477.95	1.27	405,995.27

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

Estimates of Annualized Cost to Respondents				
Recordkeeping Burden for State Agencies FNS 380, OMB 0584-0074				
Type of Respondents	Number of Active Sample Cases Per Annum	Average Time Per Response	Hourly Wage Rate (50% for State Agency Staff – not Households)	Total Respondent Cost
Reporting Burden				
State Agencies	45,497	8.4	\$11.90	\$4,545,969.25
Households	45,497	0.5	\$7.25	\$164,926.63
Total Reporting Cost Burden				\$4,710,895.87
Recordkeeping Burden				
State Agencies	45,497	0.0236	\$11.90	\$12,772.01
Base Total Reporting and Recordkeeping Costs				\$4,723,667.88
With Fully Loaded wages for State agencies Reporting and Recordkeeping			1,504,384.61	\$6,228,052.49

The overall estimated cost to the respondent for startup of the data collection with fully loaded wages is \$6,228,052.49 which includes \$4,723,667.88 base annual cost plus \$1,504,384.61 for fringe benefits. FNS adds 33 percent to the State agency’s overall respondent cost to account for the fringe benefits. The cost to the public is based on \$23.79 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$11.90. To estimate public cost, FNS used the U.S. Department of Labor’s Bureau of Labor Statistics median hourly wage for May 2018 National Occupational and Employment and Wage Estimates – 21-1020 Social Workers, (https://www.bls.gov/oes/2018/may/oes_nat.htm). In addition, the cost to households is based on the U.S. federal minimum wage of \$7.25 per hour. Based on this rate, the total estimated burden cost to households is \$164,926.63 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 \$6,510,090.26. This cost includes (1) the cost of printing reporting forms; (2) State agencies' total costs for reporting and recordkeeping with fringe benefits; (3) the cost for 2 Federal staff years [\$194,600 – two individuals earning a General Schedule (GS) 12 Step 6, to draft, review and approve the data, and data entry; (4) the cost for three FNS personnel to gather, create, and approve this information collection package and [GS 12 Step 6, GS 14 Step 1, and a GS 15 Step1]; and (5) automated system costs [includes system monitoring and salaries]. FNS salaries based on 2019 GSA tables from the Office of Personnel Management (OPM).

Table A. 14.1 Estimates of Annualized Cost to Federal Government

Estimates of Annualized Cost to Federal Government					
Reporting and Recordkeeping Cost for FNS 380, OMB 0584-0074					
Activities	Hours Spent on Collection	Costs or Hourly Wage Rate	Total Cost	Fringe Benefits Cost for Staff (0.33)	Overall Base Cost w/ Fringe Benefits for Staff
1. Printing Cost	N/A	\$2,000.00	\$2,000.00	N/A	\$2,000.00
2. 50% Reimbursement Cost to States for reporting & recordkeeping administrative cost	N/A	\$4,558,741.25	\$4,558,741.25	\$1,504,384.61	\$6,063,125.86
3. 2 Regional Federal Staff (GS 12 Step 6)	N/A	\$194,600.00	\$194,600.00	\$64,218.00	\$258,818.00
4a .Program Analyst GS 12 Step 6	80	\$46.62	\$3,729.60	\$1,230.77	\$4,960.37

Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR					
4b. Program Branch Chief Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	10	\$56.15	\$561.50	\$185.30	\$746.80
4c. Program Division Director Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	5	\$66.05	\$330.25	\$108.98	\$439.23
5. Automated System Cost (includes fringe benefits in fixed rate Contractor Monitoring)	N/A	\$180,000.00	\$180,000.00	N/A	\$180,000.00
Grand Total Cost to Government		\$4,935,510.07	\$4,939,962.60	\$1,570,127.66	\$6,510,090.26

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 request to reinstate an expired information collection with change. Due to statute, FNS is still legally required to collection this data and thereby continuing to collection in violation of the Paperwork Reduction Act. The current burden inventory is 518,930 burden hours. The revised OMB inventory for the reporting and recordkeeping burden associated with the FNS-380 is approximately 405,995.27 annual burden hours (382,173.04 SA reporting + 22,748.50 I/H reporting + 1,073.73 SA recordkeeping) and 318,477.95 total annual response (227,483.95 SA reporting + 45,497 I/H reporting + 45,497 SA recordkeeping). This program adjustment reflects a decrease of approximately -112,935 burden hours and an increase of 153,277 total annual responses. The difference is primarily a result of the decrease in the overall active QC caseload sample where the number of reviews decreased from 55,067 to 45,497 since our last collection. The increase in the total annual responses is due to miscalculations in how to account for the different burden activities.

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.