OMB INFORMATION COLLECTION PACKAGE North Carolina

OMB Information Collection Package	State agency Reporting Requirement	Current Hrs Per Response	Too High? Too Low? or Accurate	Reason(s) why?
OMB 0584- 0074	FNS Form 380	8.9	Too Low	 This calculation does not appear to take into consideration the SQCR's travel time to conduct face-to-face interviews with clients. Also, SQC conducts computer matches, send appointment notices and obtain info from the State eligibility system and County computer systems/records. Total est. time = 12 hrs. Prepping for the interview = 3 hrs. Scheduling interviews, mailing letters, contacting counties to obtain case records = 1 hr. Travel to/from interviews = 3 hrs. Requesting info from client / collateral contacts = 1 Completing the FNS-380 = 2 Second party review process to ensure accuracy = 2

From:	Moore, Pat		
То:	<u>O"Neal, Lacy - FNS; Fettig, Samantha</u>		
Cc:	<u>Wilkinson, Tiffany - FNS</u>		
Subject:	RE: [External] State Agency Reporting-Burden Estimates		
Date:	Friday, November 15, 2019 2:50:05 PM		
Attachments:	NCs Response - OMB Information Collection Package 2019.docx NH Response - State Agency Reporting-Burden Estimates.pdf		

Please find attached responses from NC and NH. I received auto replies from several people that they are out of the office.

I can ask the regional directors to share this with all of the states with a turnaround for next week. Just let me know.

Also, NC's FNS 380 estimate is higher than yours and New Hampshire's because we have a complex State eligibility determination system that requires reviewing many screens to obtain case info.

Pat Moore

Food & Nutrition Services Quality Control Program Administrator Division of Social Services, Performance Management/Reporting & Evaluation Management Section <u>NC Department of Health and Human Services</u>

Office: 919-527-6282 Fax: 919-334-1266 pat.moore@dhhs.nc.gov

820 S. Boylan Avenue, Hargrove Building 2416 Mail Service Center Raleigh, NC 27699-2416

Twitter | Facebook | YouTube | LinkedIn

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: O'Neal, Lacy - FNS <lacy.oneal@usda.gov>
Sent: Friday, November 1, 2019 1:36 PM
To: Moore, Pat <pat.moore@dhhs.nc.gov>; Fettig, Samantha <samantha.fettig@dhhs.nc.gov>
Cc: Wilkinson, Tiffany - FNS <tiffany.wilkinson@usda.gov>
Subject: [External] State Agency Reporting-Burden Estimates

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Hello Pat and Samantha:

We would like to get feedback from the QC TAG on a few of SNAP QC's estimated reporting burden hours for three of our information burden packages:

- 1. OMB 0584-0074 (FNS Form 380)
- 2. OMB 0584-0299 (FNS Form 380-1)

From:	<u>O"Neal, Lacy - FNS</u>	
То:	Moore, Pat; Fettig, Samantha	
Cc:	Wilkinson, Tiffany - FNS	
Subject:	State Agency Reporting-Burden Estimates	
Date:	Friday, November 1, 2019 1:36:32 PM	
Attachments:	Appendix C - 60 Day Notice.pdf	
	Appendix C - OMB 0584-0299 60 Day Notice Publication.pdf	
	OMB 0584-0303 275 SS after OIRA 7-14-170FFICIAL.docx	

Hello Pat and Samantha:

We would like to get feedback from the QC TAG on a few of SNAP QC's estimated reporting burden hours for three of our information burden packages:

- 1. OMB 0584-0074 (FNS Form 380)
- 2. OMB 0584-0299 (FNS Form 380-1)
- 3. OMB 0584-0303 (FNS 275 regulations-Includes Sampling, Arbitration, Good Cause Appeals, New Investment plan and progress report burden hours)

Packages one and two were published in the Federal Register on June 17, 2019 - they are the PDF documents attached. We received comments from individual citizens but did not receive any comments from State Agencies.

We are also beginning our work on revising the burden estimates for the third package: FNS 275 regulations, which include burden estimates for states to update their sampling plans, do arbitrations, time to appeal payment error rates through the good cause process, and create New Investment Plans and progress report updates. We have particular concerns regarding the current reporting estimate for updating sampling plans in this package. The last OMB approved supporting statement for the FNS 275 regulation related burden is also attached.

For TAG member convenience, we listed each reporting requirement below and are hoping to gain the following information from TAG members: Is the current state agency reporting burden too high, too low, or accurate and reason(s) for that response. For reasons why, feel free to respond outside of the table if that is most helpful. For more information, please refer to the attached documents.

OMB Information Collection Package	State agency Reporting Requirement	Current Hrs Per Response	Too High? Too Low? or Accurate	Reason(s) why?
OMB 0584-0074	FNS Form 380	8.9		
OMB 0584-0299	FNS Form 380-1	1.056		
	Sampling Plan	5		
	Arbitration	24		
01/5	Good Cause	160		
OMB 0584-0303	New Investment Plan Template Form FNS 74 A	32		
	New Investment			

Plan Template 5 Form FNS 74 B	
----------------------------------	--

Please know that the Office of Management and Budget requires we submit commenter information with our updated submissions. This is standard procedure, just as with any federal register publication the public is able to review on regulations.gov. Thank you, in advance, for your assistance as we work to improve the estimates of these QC related burdens. Responses may be sent to me at <u>lacy.oneal@usda.gov</u> by Friday, November 15, 2019, and I will route them to the appropriate team members.

Thank you,

Lacy O'Neal US Department of Agriculture SNAP – Quality Control Branch 703-305-2516