

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 request for reinstatement of an expired information collection. 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). 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.

State Agencies Reporting Burden Requirements

275.(12)(f) Reporting requirements- FNS 380-1

Reviewers shall report review findings on the Form FNS-380-1, in accordance with the following procedures: If the reviewer determines that a case is ineligible, the occurrence and the total allotment issued shall be coded and reported as an error. Whenever a case contains a variance in an element which results in an ineligibility determination and there are also variances in elements which would cause a basis of issuance error, the case shall be treated as an eligibility error. The reviewer shall also code and report any variances that directly contributed to the error determination. In addition, the reviewer shall code and report any other variances related to eligibility which were discovered and verified during the course of the review. If the reviewer determines that SNAP allotments were either overissued or underissued to eligible households, the State agency shall code and report any variances that directly contributed to the error determination that were discovered and verified during the course of the review.

Ongoing burden hours: FNS estimates that 53 State agencies will report on 59,146 QC cases at a rate of approximately 1.056 hours per case, resulting in an estimated total of 62,458.049 annual burden hours.

State Agencies Recordkeeping Requirements--Part 275.4

275.4 Record Retention- FNS 380-1

The State agency shall maintain Performance Reporting System records to permit ready access to, and use of, these records. Performance Reporting System records include information used in data analysis and evaluation, corrective action plans, corrective action monitoring records in addition to ME review records and QC review records. QC review records consist of the use of official forms: OMB 0584-0074, Expiration Date: 03/31/2020 (currently under review at OMB)

FNS-388, Worksheet for Supplemental Nutrition Assistance Program, OMB 0584-0299

Expiration Date: 03/31/2020 (currently under program development in this collection seek OMB approval) FNS-380-1; Quality Control Review Schedule, and OMB 0584-0034, Expiration Date: 4/40/2021, FNS-245, Negative Quality Control Review Schedule; other materials supporting the review decision, including all correspondence with the household and all case notes, digital or otherwise, taken or used by the eligibility worker that are applicable to the review period; sample lists; sampling frames; tabulation sheets; and reports of the results of all quality control reviews during each review period.

Ongoing burden hours: FNS estimates that 53 State agencies will keep records for 59,146 QC cases at a rate of approximately 0.0236 hour per case, resulting in an estimated total of 1,395.85 annual burden hours.

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. 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/>.

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. 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 mandatory data collection which is being collected in violation of the Paperwork Reduction Act. Without this collection, FNS would not be able to ensure program

integrity. Errors made in the certification of benefits would not be effectively monitored or reduced, program policy strategies would not be satisfactorily developed, sanctions 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, 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, Pages 28002-28003). We received six comments in response to this notice (Appendix D). Five of the six comments were unrelated to the purpose of our collection. One commenter requested information and clarification about what changes were being made to FNS Form 380-1. None of the comments received were related to the need, practical utility, quality, and clarity of the information, evaluate the accuracy of the agency's estimate of the burden, or provide comments on minimizing the burden or the cost. Nor were any of the comments in favor of or in opposition of the information contained in the notice. FNS responded to all of the individuals who made comments and provided contact information (Appendix D). All of the comments were posted to fdms.gov for the public.

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 agreed the amount of time FNS has estimated for completing, submitting, and keeping records for the FNS 380-1 was accurate. Their comments are also included in the appendices (Appendix E1 and E2).

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 380-1 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 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.

A final rule entitled “Civil Rights Data Collection” was published at Volume 71 FR 28759, Number 96 on May 18, 2006 by FNS. This rule revises the racial and ethnic data collection and reporting [using FNS 191 and FNS 101 approved under Food Program Reporting System (FPRS) OMB Control Number 0584-0594; Expiration 3/31/2020 currently under review at OMB] 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. When applicants refuse to provide race or ethnicity State Eligibility Workers will classify based on visual observation. Although the rule implementing the revised data collection standards will require eligibility workers to collect both race and ethnicity on participating households, the information will standardize racial ethnic data collection by States for the Federal Government and will permit more accurate data collection on individuals who classify themselves as being of more than one race. FNS intends to allow State agencies to record one race per person when visual observation is used because the applicant chooses not to self- identify. 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 4/30/2021, currently under review by OMB for reinstatement.

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 49,118.33 reporting and recordkeeping burden hours and 90,944 total annual responses. There are 53 State agencies required to conduct QC reviews of the active cases as part of the Performance Reporting System. FNS assumes the same State agencies will maintain these records. 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 cases nationwide for a total of 858.43 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 1.056 hours per response for reporting. The annual estimate for reporting is 48,044.83 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 45,497 records per year and the frequency of responses per respondent is approximately 858.43 records to keep. We estimate the annual burden for recordkeeping is 1,073.7242 hours. We estimate the total annual hour burden of the

collection of information is 49,118.56 hours. This burden was arrived at by adding together the estimated reporting burden and the estimated recordkeeping burden as follows:

Table A12. 1 Reporting Estimates of Hour Burden

Reporting Burden							
Reporting Burden for Individuals/Households FNS 380-1, OMB 0584-0299							
Form Number	Reg. Section	Description of Activity	No. of Respondents	Est. No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Est. Total Burden Hours
FNS-380-1	275.12(f)	Reporting of Review Findings	53	858.4340	45,497,000 0	1.056	48,044.832 0

Table A12. 2 Record Keeping Burden

Record Keeping Burden							
Recordkeeping Burden for Individuals/Households FNS 380-1, OMB 0584-0299							
Form Number	Reg. Section	Description of Activity	No. of Record keepers	Est. No. of Records per Record keeper	Est. Total Annual Responses	No. Hours per Record to be Maintained	Est. Total Burden Hours
FNS-380-1	275.4	Record Retention	53	858.4340	45,497.0000	0.0236	1,073.7292

Table A12. 3 Grand Total – Reporting and Record Keeping Burden

Form Number	Reg. Section	Description of Activity	Frequency	Est. No. of Responses per	Est. Total Annual Responses	No. Hours per	Est. Total Annual Burden Hours
Grand Total Reporting and Recordkeeping Burden			53	1,716.87	90,994	1.0796	49,118.56

B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Table A12. 4 Estimates of Annualized Cost to Respondents

Estimates of Annualized Cost to Respondents				
FNS 380-1, OMB 0584-0299				
Type of Respondents	Number of Active Sample Cases Per Annum	Average Time Per Response	50 % Hourly Wage Rate	Total Respondent Cost
Reporting Burden				
State Agencies	45,497	1.056	\$11.8950	\$571,493.28
Recordkeeping Burden				
State Agencies	45,497	0.0236	11.8950	\$12,772.0088
Grand Total Reporting & Recordkeeping Burden – Annualized Costs	90,994	1.080	23.79	\$584,265.29
Total With Fringe Benefits			\$192,807.54	\$777,072.83

The overall estimated cost to the respondent for startup of the data collection with fully loaded wages is \$777,072.83 which includes (\$584,262.29 base annual cost + \$192,807.54 (fringe benefits). FNS adds 33 percent to the respondent’s cost to account for State agency staff’s fringe benefits. The base annual cost for this collection is estimated at \$584,265.29. The cost to the public is based on \$23.79 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$11.895. FNS determine the cost to respondent by multiplying the hourly wage rate by the total annual burden hours for each activity. 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).

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 \$1,224,037.23 (fully-loaded wages). 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 [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).

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	\$584,265.29	\$584,265.29	\$192,807.55	\$777,072.84
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 Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	80	\$46.62	\$3,729.60	\$1,230.77	\$4,960.37
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		\$961,034.11	\$965,486.64	\$258,550.59	\$1,224,037.23

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 request for reinstatement of an expired information collection. 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 expired burden hours in use on OMB’s inventory is 59,450 burden hours and 110,134 total annual responses. FNS is requesting a total of 49,118 annual burden hours (48,044.83 reporting and 1,073.73 recordkeeping burden hours and 90,994 total annual responses (45,497 reporting and 45,497 recordkeeping) associated with the FNS-380-1. This program adjustment reflects a decrease of -10,331 hours and a decrease of -19,140 total annual response. This difference is primarily a result of the decrease in the overall active household caseload sample reported where the number of completed reviews decreased from 55,067 to 45,497 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.

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 SNAP 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.