Appendix E2- OMB 0584-0299

From: Lamere, Denise To: Moore, Pat **Cc:** Fettig, Samantha

Subject: RE: [External] State Agency Reporting-Burden Estimates **Date:** Friday, November 15, 2019 9:11:19 AM

| OMB Information Collection Package | State agency Reporting Requirement | Current Hrs Per Response | Too High? Too Low? or Accurate | Reason(s) why? |
|---|--|--------------------------------|--|---|
| OMB 0584-0299 | FNS Form 380-1 | 1.056 | Accurate Accurate | If there are no major changes to the 380-1 by FNS then 1.056 is able. |

Hi Pat and Samantha, Attached

is NH's reply. Have a great day!



Denise Lamere, Administrator Bureau of Improvement & Integrity Quality Assurance & Federal Eligibility Review Unit From: Moore, Pat

To: O"Neal, Lacy - FNS; Fettig, Samantha

Cc: Wilkinson, Tiffany - FNS

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
NC Department of Health and Human Services

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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

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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: O"Neal, Lacy - FNS

To: <u>Moore, Pat; Fettig, Samantha</u>
Cc: <u>Wilkinson, Tiffany - FNS</u>

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 | | |
| 0145 | 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 lacy.oneal@usda.gov 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