

SUPPORTING STATEMENT - PART A for
OMB Control Number 0584-NEW

Proposed Rule: Reform Provisions for the Supplemental Nutrition Assistance Program's
Quality Control System (RIN 0584-AE79)

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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.

Although we are revising existing burdens already approved by OMB, we are seeking a new OMB Control Number for the proposed provisions that would change the burden hours and responses in those collections associated with this rule. This is done so the agency doesn't interfere with the primary OMB control numbers recently approved. Once these information collection request burdens associated with this rulemaking is approved by OMB, we will submit a request to merge these additional burden hours into their respective OMB Control Numbers. The current burden inventories for components within this collection are found in OMB Control Numbers: 0584-0074, Expiration Date: 07/31/2025; 0584-0299, Expiration Date: 09/30/2026 and 0584-0303, Expiration Date: 7/31/2025. These changes are contingent upon OMB approval under the Paperwork Reduction Act of 1995. Additionally, when the information collection requirements have been approved, FNS will publish a separate action in the Federal Register announcing OMB's approval.

The legislative basis for the Quality Control (QC) system is in P.L. 115-334, Section 16 of the Food and Nutrition Act of 2008, as amended (the Act)(Appendix A1). Part 275, Subpart C, of the Supplemental Nutrition Assistance Program's (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 (Appendix A2).

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.

FNS 380 (OMB Control Number: 0584-0074)

State agencies are required to perform QC reviews for 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 F). This information, along with supporting documentation, is the basis for the determination of the accuracy of the case.

FNS 380-1 (OMB Control Number: 0584-0299)

State agencies are required to perform QC reviews for the SNAP. The FNS-380-1, Quality Control Review Schedule (QCRS) (Appendix G), 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.

FNS 275-Sampling (OMB Control Number: 0584-0303)

Section 11(d) of the Food and Nutrition Act of 2008, as amended (the Act), requires each State agency administering SNAP to submit a plan of operation specifying the manner in which the program is conducted. In addition to certain specific areas of program administration, Section 11(e) of the Act authorizes the inclusion of other provisions as required by regulation.

The legislative basis for the operation of SNAP's QC system is provided by Section 16 of the Act. Section 16 requires the U.S. Department of Agriculture (USDA) to establish a system that enhances payment accuracy and improves administration by determining payment error rates, liabilities and performance bonuses. Section 16(c) allows the Department to require a State agency to report any data deemed necessary for determining these factors. Two of the items covered by this burden, the sampling plan and arbitrations of State-Federal differences must be completed prior to determination of the payment and case and procedural (formerly known as negative) error rates, the national average payment and case and procedural error rate, and any liability amounts established.

Part 275 of SNAP regulations implements the QC legislative mandate. The QC system is designed to provide a basis for determining each State agency's error rate through a review of a sample of SNAP QC cases. QC data serves as an objective measure of program operations at the State level and is essential to the determination of a State agency's liability for excessive overpayments.

To help ensure that QC data is reliable and unbiased, paragraph 275.11(a) requires each State agency to submit a QC sampling plan to the FNS for approval. The sampling plan is a part of the inclusive State Plan of Operation.

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.

FNS 380 (OMB Control Number: 0584-0074)

State agencies are required to perform QC reviews for SNAP. This process includes a face-to-face interview with the household to verify 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.

FNS 380-1 (OMB Control Number: 0584-0299)

The QCRS collects both QC and case characteristic data. The information needed to complete form FNS-380-1 is obtained from SNAP case records and State QC findings.

Data collected is used by FNS and the States to monitor and reduce errors, develop policy strategies, and analyze household characteristic data. In addition, FNS uses this data to determine sanctions and bonus payments based on error rate performance and to estimate the impact of some program changes to SNAP participation and costs by analyzing the available household characteristic data.

275- QC regulations (OMB Control Number: 0584-0303)

7 CFR Part 275 of SNAP regulations implements the QC legislative mandate. The QC system is designed to provide a basis for determining each State agency's error rate through a review of a sample of (SNAP QC) cases. QC data serves as an objective measure of program operations at the State level and is essential to the determination of a State agency's entitlement to a performance bonus or liability for excessive overpayments.

Arbitration

When a State agency disagrees with a Federal QC finding on an individual case selected for review, the regulations at 7 CFR 275.3(c)(4) provide that the State agency may request that the dispute be arbitrated by a FNS Arbitrator, subject to some limitations. This component of the collection is not impacted by proposed rulemaking.

Good Cause

Paragraph 275.23(e)(7) provides a process for a State agency to seek relief from a QC liability that would otherwise be levied on the basis that the State agency had good cause for not achieving the payment error rate below the tolerance level. State agencies desiring such relief must file an appeal with the USDA's Administrative Law Judge in accordance with the procedures established under Part 283. This component of the collection is not impacted by proposed rulemaking.

New Investment

Section 16(c)(D)(i)(I) of the Act allows States in liability status to be offered a settlement agreement to invest fifty percent of a QC liability amount into SNAP administrative activities intended to reduce the State's SNAP error rates. Section 7 CFR 275.23(h) provides further detail explaining what needs to be included in the QC related new investment plans and progress reports. This component of the collection is not impacted by proposed rulemaking.

Sampling

To help ensure that QC data is reliable and unbiased, paragraph 275.11(a) requires each State agency to submit a QC sampling plan to the Food and Nutrition Service (FNS) for approval. The sampling plan is a part of the inclusive State Plan of Operation. This component of the collection is impacted by proposed rulemaking.

Sampling plan: All State agencies are required to select a QC sample of households from two universes:

- (a) The active universe of households that are participating in SNAP; and
- (b) The case and procedural universe of households, whose participation was denied, suspended or terminated.

Each State agency is responsible for the design and selection of the QC samples, subject to the regulations at 7 CFR 275.11 and FNS approval. Each State agency must submit a QC sampling plan and subsequent modifications of sample design, frame, or procedures to FNS. States presently send their sampling plans mostly through email, though a handful still send their plans using the postal service. The sampling plan must include a complete description of the frame, the method of sample selection, and methods for estimating characteristics of the population and sampling errors. In addition, the sampling plan must include a description of its relationship, if any, to other federally mandated programs. All sampling procedures used by the State agency, including frame composition and construction, must be fully documented and available for review by FNS.

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.

FNS 380 (OMB Control Numbers: 0584-0074) **and** *FNS 380-1* (OMB Control Numbers: 0584-0299)

FNS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. Currently, 53 State agencies submit the FNS 380 and 380-1 to FNS via SNAP quality control's automated system, SNAP-QCS, through upload or by direct data entry at <https://snapqcs.fns.usda.gov/>; as such, 100 percent of responses are submitted electronically. SNAP-QCS 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 to FNS, once cases are transmitted.

275-Sampling

In compliance with the E-Government Act, 2002 (E-Gov), this specific type of collection is not amenable to automated, electronic, mechanical or other technological techniques or other forms of information technology. However, States are encouraged to automate their sampling plans but are not mandated to do so.

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 similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS monitors State performance

to ensure that the program is being efficiently and economically operated. FNS solely uses the QC review system to assess errors in SNAP benefits 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.

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

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.

FNS 380 (OMB Control Number: 0584-0074) *and FNS 380-1* (OMB Control Number: 0584-0299)

This is an ongoing mandatory data collection. Without this collection, FNS would not be able to ensure program integrity of SNAP. 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 characteristics data would be incomplete or delayed.

275-Sampling (OMB Control Number: 0584-0303)

Less frequent collection could allow incorrect or inappropriate State agency sampling methodology to go undetected. Without a QC sampling plan FNS could not ensure program integrity. There would be no assurance that State agencies operate their QC system in

compliance with the Food and Nutrition Act of 2008, as amended, and SNAP regulations. This can potentially introduce a bias and adversely affect the integrity of the QC system. There are no technical or legal obstacles to reducing the burden for the sampling plan.

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;**

FNS 380 (OMB Control Number: 0584-0074) **and** *FNS 380-1* (OMB Control Number: 0584-0299)

State agencies are required to select, conduct, and report on QC reviews on a monthly, ongoing basis. FNS QC rules at 7 CFR 275.11(b) specify sampling requirements for State agencies.

- **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;**

FNS 380 (OMB Control Numbers: 0584-0074) **and** *380-1* (OMB Control Numbers: 0584-0299)

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.

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.

On June 1, 2018, the Department published a Request for Information in the Federal Register titled, *Supplemental Nutrition Assistance Program (SNAP) Quality Control Integrity and Modernization* (83 FR 25425) to solicit input from the public and stakeholders on how best to simplify and reform the QC system. Feedback received on provisions that ended up in rulemaking are specifically addressed in the rulemaking. None of the comments received addressed burden specifically for any provisions proposed in the rule.

The proposed rule, **Reform Provisions for the Supplemental Nutrition Assistance Program's Quality Control Systems (RIN 0584-AE79)** was published on September 19, 2023 (88 FR64756) and this information collection associated with it was included and allowed 60 days for public comment. Its correction was also published on December 19, 2023 (88 FR 87725), and extended the comment period for the rule for an additional 14 days.. Comments were received and evaluated on the information collection requirements during that time. Interested members of the public had the opportunity to provide FNS with comments concerning the necessity, practical utility, accuracy, and merit of the information collection activities proposed. Comments will be addressed during the final stage of rulemaking with the final rule information collection request.

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.

FNS 380 (OMB Control Numbers: 0584-0074) and 380-1 (OMB Control Numbers: 0584-0299)

Information gathered from State agency records and household interviews during the active case reviews are subject to the same safeguards as information obtained from households applying for SNAP benefits. Section 11(e)(8) of the Act 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 and 380-1 contain a Privacy Act Statement, and the data is stored in a secured database. The applications for authorization contain personal identifying information on individuals doing business with FNS. Therefore, FNS published a Privacy Act notice, or system of records notice (SORN), Notice of proposed new System of Records—USDA/FNS–10, entitled Persons Doing Business with FNS, on March 27, 2010 (Vol. 65, No. 63, Pages 17251-17252) (Appendix I).

SNAP's automated QC system, SNAP-QCS, does not collect data directly from households. However, the FNS-380 Quality Control Worksheet and the ability to manage digital copies of case file documents, the SNAP-QCS production database now contains personally identifiable information (PII). In SNAP-QCS, the FNS 380 informs, and the system stores all State submitted FNS 380-1 files. In addition, SNAP-QCS contains Certification Case Number (CCN) supplied by the Supplemental Nutrition Assistance Program (SNAP) State Agencies. Some State Agencies embed the SSN in their CCNs. CCNs are used by SNAP-QCS as a reference number relating back to the State Agency. As such, the system maintains a privacy impact assessment. The most recent and current was conducted in July 2019 (Appendix H).

Access to electronic 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 tools to lock down files; strong encryption standards for sensitive documents using the industry standard of AES as the encryption algorithm; and, to prevent unauthorized users, we have implemented a firewall). Paper records, if received, 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.

275- *Sampling* (OMB Control Numbers: 0584-0303)

The Department complies with the Privacy Act of 1974.

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.

FNS 380 (OMB Control Number: 0584-0074)

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 or shared with anyone, except as otherwise required by law.

FNS 380-1 (OMB Control Number: 0584-0299)

A final rule entitled “Civil Rights Data Collection” was published on May 18, 2006 by FNS. This rule revises the racial and ethnic data collection and reporting 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. 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 most recent racial/ethnic codes.

275-Sampling (OMB Control Number: 0584-0303)

There are no questions of a sensitive nature.

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.

Component 1) Form FNS–380 [OMB Control Number: 0584-0074], is a SNAP worksheet used to determine eligibility and benefits for households selected for review in the QC sample of active SNAP cases. This form provides a systematic means of aiding the State's Quality Control Reviewer in analyzing the case record, planning and doing field investigation

and gathering, comparing, analyzing and evaluating data. FNS estimates that while this rule will require thirty percent more cases (households) be reviewed for QC, the rule does not change the existing burden on households, and will effectively decrease the ongoing burden for 53 State agencies by 20,151 hours annually. In addition, in order to implement the changes of the rule in the first year, the rule will add 196,915.17 startup burden hours for state agencies. These startup hours include 40 hours of training for 263 state QC reviewers on just the new review procedures for active cases, 64 hours to train 371 reviewers on using both SNAPQCS's automated FNS 380 worksheet and the new review procedures for active cases, and FNS is including 2.75 hours of additional time for State agencies to complete the FNS 380 worksheet for each case review to properly review and document according to the new procedures for the active case review. The revised total ongoing burden associated with this rule for this component is 385,844.12 reporting and recordkeeping burden hours and the first year's total reporting and recordkeeping burden due to rulemaking including the startup hours is 196,915.17 hours, bringing the total burden in the first year of implementation of the rule to 582,759.29 reporting and recordkeeping hours for this component.

Component 2) FNS 380-1[OMB Control Number: 0584-0299], is SNAP's QC Review Schedule which collects QC and household characteristics data. The information needed to complete this form is obtained from the SNAP case record and state quality control findings. The information is used to monitor and reduce errors, develop policy strategies, and analyze household characteristic data. FNS estimates this rule will require 53 State agencies a revised total of 63,853.892 ongoing reporting and recordkeeping burden hours annually for this component of this collection. This is an increase of 14,735.33 burden hours. An estimated total of 742 additional startup hours are necessary for the first year's implementation of components

within this collection for this rule. This startup includes 2 hours for 371 state QC reviewers to be trained on how to use SNAPQCS's automated FNS 380-1 worksheet. The revised total reporting and recordkeeping ongoing burden hours for the first year 64,595.89 hours.

Component 3) In the 275 regulations [OMB Control Number: 0584-0303], each State agency is required to develop a QC sampling plan that demonstrates the integrity of its case selection procedures. The QC system is designed to measure each State agency's payment error rate based on a statistically valid sample of SNAP cases. A State agency's payment error rate represents the proportion of cases that were reported through a QC review as being ineligible, overissued and underissued as well as the proportion of SNAP benefits that were either overissued or underissued to SNAP households. The FNS 311 Handbook is used by State agencies as a reference tool for creating their sampling plans. The current ongoing reporting and recordkeeping burden for this collection is 2,829 hours. FNS estimates this rule will require 53 State agencies a revised total of 2,829 ongoing reporting and recordkeeping hours and an additional 2,120 startup reporting burden hours for this first year of implementation of components within this rule. These startup hours include 40 hours for 53 state agency statisticians to update their state's sampling procedures to comply with the new sampling requirements of this rule. The first year of implementation for this component of the rule will require a total of 4,949 reporting and recordkeeping burden hours.

In total, FNS estimates this rule will decrease the overall ongoing burden associated with these three collections by 5,416 reporting burden hours. The overall total burden for these three components associated with the rule will require 53 State agencies, a total of 422,951 ongoing reporting and recordkeeping burden hours and 59,146 households 29,573 ongoing reporting burden hours annually. FNS also estimates this rule will require State agencies an

additional 199,777.17 startup burden hours to implement the changes in this rule. Therefore, a grand total of 652,305 reporting and recordkeeping burden hours are estimated for this first year of implementation for this rule.

This rule affects the three components of the QC process mentioned above, the use of 1) FNS forms 380, 2) FNS 380-1 and 3) the creation of the State QC Sampling plan. The average burden per response and the annual startup and ongoing burden hours are explained below and summarized in the charts that follow.

Table 12A.1 Revised I/H reporting burden.

Reporting Burden for Individuals/Households FNS 380, OMB 0584-0074									
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	REVISED Total Annual responses	REVISED Number of Burden Hours Per Response	REVISED Estimated Total Burden Hours	Previous Submission Total Hours	Difference Due to Program Changes	Difference Due to Adjustments
275.12 (c)(1)	Personal Interviews- Individuals or Households	59,146.00	1	59146.00	0.5	29,573	22,748		+6,825
Individuals & Households Grand Total Reporting Burden Hours		59146.00		59146.00		29,573			+6,825

Table 12A.2 Revised State agency (SA) reporting and recordkeeping burden 0074.

Reporting Burden for State Agencies FNS 380, OMB 0584-0074									
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	REVISED Total Annual responses	REVISED Number of Burden Hours Per Response	REVISED Estimated Total Burden Hours	Previous Submission Total Hours	Difference Due to Program Changes	Difference Due to Adjustments
275.2(c)(1) (v)	Notification to discuss individual cases	5	1	5	0.08	0.4000	0.40	0	
275.12 (b)	Household Case Record Review	53	1115.96	59,146	2	118,292	136490.37	-18,199	
275.12 (c)	Field investigation	53	1115.96	59,146	2	118,292	159238.77	-40,947	
275.12 (c) (1)	Personal interviews	53	1115.96	59,146	0.5	29,573	22748.40	6,825	
275.12 (d) (1)	Variance identification	53	1115.96	59,146	0.5	29,573	40947.11	-11,374	
275.12 (e)	Error analysis	53	1115.96	59,146	0.5	29,573	22748.40	6,825	
275.12 (f)	Reporting of review	53	1115.96	59,146	0.25	14,786	n/a	14,786	

	findings								
275.12 (d) (3)	Reporting all variances to Local offices	53	1115.96	59,146	0.25	14,786	n/a	14,786	
Sub Total Reporting Burden		53	7811.8143396	414,026	0.8571335	354,876	382,173	-27,298	0

Recordkeeping Burden for State Agencies FNS 380, OMB 0584-0074									
FNS 380 Recordkeeping									
275.4	Record Retention	53	1115.96	59,146	0.0236	1,396	1,073.73	322.113568	
Grand Total Reporting & Recordkeeping Burden		53	8927.77434	473,172	0.7529429	356,272	383,247	-26,976	0

Table 12A.3 State agency (SA) reporting startup burden 0074.

Reporting Burden Hours for State Agencies FNS 380, OMB 0584-0074 STARTUP Hours First Year Only						
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	Startup Annual responses	Startup Number of Burden Hours Per Response	Startup Estimated Total Burden Hours
275.12 (d)(1)	Variance identification	53	1115.96	59,146	0.75	44,359.41
275.12 (e)	Error analysis	53	1115.96	59,146	0.75	44,359.41
275.12 (f)	Reporting of review findings	53	1115.96	59,146	0.5	29,572.94
275.12 (d)(3)	Reporting findings to Local offices	53	1115.96	59,146	0.75	44,359.41
275.12	Training State Agency QC reviewers on New Actives Process only	263	1	263	40	10,520.00
275.12 and 275.21 (b) (1)	Train reviewers on New Actives Process AND train new SNAPQCS users (reviewers) how to use SNAPQCS for 380	371	1	371	64	23,744.00

Grand Total STARTUP Hours Reporting Burden Only	687	345.294789	237,218	0.83010382	196,915.17
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Table 12A.4 State agency (SA) reporting revised burden 0299.

FNS 380-1 Reporting ongoing for State Agencies OMB Control Number 0584-0299									
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	Revised Total Annual responses	Revised Number of Burden Hours Per Response	Revised Estimated Total Annual Burden Hours	Previous Submission Total Hours	Difference Due to Program Changes	Difference Due to Adjustments
275.12(f)	Reporting of Review Findings	53	1115.96	59,146	1.056	62,458.049	48,044.83	14,413.22	
Grand Total Reporting Burden Hours Only		53	1115.96	59146	1.056	62,458.049		14413.22	

FNS 380-1 Recordkeeping ongoing									
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	Annual responses	Ongoing Number of Burden Hours Per Response	Number of Annual Burden Hours Per Response	Previously Submission Total Burden	Differences Due to Program Changes	Differences Due to Adjustments
275.4	Record Retention	53	1115.96	59,146	0.0236	1395.842768	1,073.7292	322.1136	
Grand Total Affected Public		53	2231.92	118,292	1.07960	63,853.892	49,118.56	14,735.33	

Table 12A.5 State agency (SA) startup burden 0299.

FNS 380-1 Reporting for State Agencies OMB Control Number 0584-0299 STARTUP First Year Only
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Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	Startup Annual responses	Startup Number of Burden Hours Per Response	Startup Number of Annual Burden Hours Per Response
275.21 (b)(1)	Train new State agency reviewers how to use SNAPQCS for 380-1	371	1	371	2	742
Grand Total STARTUP Hours Reporting Burden Only		371	1	371	2	742

Table 12A.6 State agency (SA) revised burden 0303.

275 Regs Reporting OMB 0584-0303

Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	REVISED Total Annual responses	REVISED Number of Burden Hours Per Response	REVISED Estimated Total Burden Hours	Previous Submission Total Hours	Difference Due to Program Changes
275.11(a)(1)-(a)(2)	Sampling Plan	53	1	53	20	1060	1060	0
275.2(c)(1)(i)	Use of 3rd Party Contractors-Notification of intent to hire	3	1	3	0.25	0.75	0.75	0
275.2(c)(1)(ii)	Use of 3rd Party Contractors-Submission of signed contract and tasks	3	1	3	0.5	1.5	1.5	0
275.2(c)(1)(iii)	Use of 3rd Party Contractors-Submission	3	1	3	0.5	1.5	1.5	0

	of completed deliverables							
275.2(c)(1)(iv)	Use of 3rd Party Contractors-Notification of training sessions	3	1	3	0.08	0.24	0.24	0
275.2(c)(4)	Arbitration Process	12	3	36	34	1224	1224	0
273.23(f)	Good Cause Process	1	1	1	160	160	160	0
275.23(h)	New Investment Plan Template Form FNS 74 A	9	1	9	32	288	288	0
275.23(h)(4)	New Investment Progress Report Template Form FNS 74 B	9	2	18	5	90	90	0
SUB-TOTAL REPORTING BURDEN		53	2.43396226	129	21.9068992	2825.99	2825.99	0

275 Recordkeeping OMB 0584-0303									
275.4	Sampling Plan Record Retention	53	1	53	0.0236	1.2508	1.2508	0	
275.4	Arbitration Process Record Retention	12	3	36	0.0236	0.8496	0.8496	0	
275.4	Good Cause Process Record Retention	1	1	1	0.0236	0.0236	0.0236	0	
275.4	New Investment Plan Template Form FNS 74 A Record Retention	9	1	9	0.0236	0.2124	0.2124	0	

275.4	New Investment Progress Report Template Form FNS 74 B Record Retention	9	2	18	0.0236	0.4248	0.4248	0	
Recordkeeping Total		53	2.20754717	117	0.0236	2.7612	2.7612	0	
Grand Total REPORTING & RECORDKEEPING									
		53	4.64150943	246	11.4989886	2828.7512	2828.7512	0	0

275 Regs Reporting OMB 0584-0303									
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	REVISED Total Annual responses	REVISED Number of Burden Hours Per Response	REVISED Estimated Total Burden Hours	Previous Submission Total Hours	Difference Due to Program Changes	Difference Due to Adjustments
275.11(a)(1)-(a)(2)	Sampling Plan	53	1	53	20	1060	1060	0	0
275.11(a)(4)(i)	State Attestation	53	1	53	0.2	10.6	0	10.6	0
275.2(c)(1)(i)	Use of 3rd Party Contractors-Notification of intent to hire	3	1	3	0.25	0.75	0.75	0	0
275.2(c)(1)(ii)	Use of 3rd Party Contractors-Submission of signed contract and tasks	3	1	3	0.5	1.5	1.5	0	0
275.2(c)(1)(iii)	Use of 3rd Party Contractors-Submission of completed deliverables	3	1	3	0.5	1.5	1.5	0	0
275.2(c)(1)(iv)	Use of 3rd Party Contractors-Notification of training	3	1	3	0.08	0.24	0.24	0	0

	sessions								
275.2(c)(4)	Arbitration Process	12	3	36	34	1224	1224	0	0
273.23(f)	Good Cause Process	1	1	1	160	160	160	0	0
275.23(h)	New Investment Plan Template Form FNS 74 A	9	1	9	32	288	288	0	0
275.23(h)(4)	New Investment Progress Report Template Form FNS 74 B	9	2	18	5	90	90	0	0
SUB-TOTAL REPORTING BURDEN		53	3.43396226	182	15.58566	2836.59	2825.99	10.6	0
275 Recordkeeping OMB 0584-0303									
275.4	Sampling Plan (will include attestation) Record Retention	53	1	53	0.0236	1.2508	1.2508	0	
275.4	Arbitration Process Record Retention	12	3	36	0.0236	0.8496	0.8496	0	
275.4	Good Cause Process Record Retention	1	1	1	0.0236	0.0236	0.0236	0	
275.4	New Investment Plan Template Form FNS 74 A Record Retention	9	1	9	0.0236	0.2124	0.2124	0	
275.4	New Investment Progress Report Template Form	9	2	18	0.0236	0.4248	0.4248	0	

	FNS 74 B Record Retention								
Recordkeeping Total		53	2.2075471 7	117	0.0236	2.7612	2.7612	0	
Grand Total REPORTING & RECORDKEEPING		53	5.6415094 3	299	9.496158	2839.351 2	2828.7512	10.6	0

Table 12A.7 State agency (SA) startup burden 0303.

275 Regs Reporting STARTUP OMB CONTROL NUMBER 0584-0303						
Reg. Section	Description of Activity	Estimated Number of Respondents	Estimated responses per respondent	REVISED Total Annual responses	REVISED Number of Burden Hours Per Response	REVISED Estimated Total Burden Hours
275.11	Implement new sampling plan	53	1	53	40	2,120
Grand Total Reporting Burden		53		53		2,120

Table 12A.8 SUMMARY OF GRAND TOTAL ANNUAL REPORTING & RECORDKEEPING BURDEN ESTIMATES

Form or Citation	Description of Activity (Ongoing or Start up)	Estimated Number of Respondents	Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours
380 SA	Ongoing	53	473,172	0.75295	353,272.00
380 I/H	ongoing	59,146	59,146	0.5	29,573.00
380-1	Ongoing	53	118,292	1.0796	63,854.00
275	Ongoing	53	246	20	2828
380 SA	Startup	53	236584	2.75	162651

380 SA Staff train on Review process	Startup	263	263	40	10,520.00
380 SA Staff train on Review process and SNAPQCS	Startup	371	371	64	23,744.00
380-1 SA Staff for SNAPQCS	Startup	371	371	2	742
275 Regulations	Startup	53	53	40	2120
GRAND TOTAL REPORTING AND RECORDKEEPING BURDEN For Rule		59886	888,498	98	649,304.00

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

Table 12B.1

Form or Citation	Description of Activity (Ongoing or Start up)	Estimated Number of Respondents	Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours	Hourly Wage Rate (50% for State agency Staff)	Total Respondent Cost	Total Cost plus Fringe Benefit Adjustment (respondent cost + 33%)
380 SA	Ongoing	53	473,172	0.75295	353,272.00	\$13.92	\$4,915,779.88	\$6,537,987.24
380 I/H	ongoing	59,146	59,146	0.5	29,573.00	\$7.25	\$214,404.25	\$214,404.25
380-1	Ongoing	53	118,292	1.0796	63,854.00	\$13.92	\$888,528.41	\$1,181,742.79
275	Ongoing	53	246	20	2828	\$23.91	\$67,603.34	\$89,912.44
GRAND TOTAL REPORTING AND RECORDKEEPING BURDEN For Rule		59199	650,856	22	449,527		\$6,086,315.88	\$8,024,046.72

The overall estimated cost to the respondent for annual ongoing data collection with fully loaded wages is \$8,024,046.72 which includes \$6,086,315.88 ongoing cost + \$1,937,730.84 (fringe benefits). The cost to the public is based on \$27.83 per hour for a social worker’s salary and

\$47.81 for a statistician’s salary. The rate to State agencies after 50 percent reimbursement by FNS is \$13.92 and \$23.91 per hour respectively. Thirty three percent is added to the State agency personnel’s respondent cost to include the cost of their fringe benefits. To estimate public cost, FNS consulted with the U.S. Department of Labor’s median hourly wages for May of 2021; National Occupational Employment and Wage Estimates United States https://www.bls.gov/oes/2021/may/oes_nat.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 \$214,404.25. No fringe benefits are included in the household’s financial burden. The estimate for household reporting cost was estimated by using the U.S. Department of Labor’s most recent Federal minimum wage found at <https://www.dol.gov/general/topic/wages/minimumwage>.

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.

Table 13A.1

Form or Citation	Description of Activity (Ongoing or Start up)	Estimated Number of Respondents	Annual responses	Number of Burden Hours Per Response	Estimated Total Burden Hours
380 SA	Startup	53	236584	2.75	162651
380 SA Staff train on Review process	Startup	263	263	40	10,520.00
380 SA Staff train on Review process and SNAPQCS	Startup	371	371	64	23,744.00
380-1 SA Staff for SNAPQCS	Startup	371	371	2	742
275 Regulations	Startup	53	53	40	2120
GRAND TOTAL startup REPORTING AND RECORDKEEPING BURDEN For Rule		59886	888,498	98	649,304.00

Form or Citation	Description of Activity (Ongoing or Start up)	Estimated Total Burden Hours	Hourly Wage Rate (50% for State agency Staff)	Total Respondent Cost	Total Cost plus Fringe Benefit Adjustment (respondent cost + 33%)
380 SA	Startup	162651	\$13.92	\$2,263,288.67	\$3,010,173.92
380 SA Staff train on Review process	Startup	10,520.00	\$13.92	\$146,385.80	\$194,693.11
380 SA Staff train on Review process and SNAPQCS	Startup	23,744.00	\$13.92	\$330,397.76	\$439,429.02
380-1 SA Staff for SNAPQCS	Startup	742	\$13.92	\$10,324.93	\$13,732.16
275 Regulations	Startup	2120	\$23.91	\$50,678.60	\$67,402.54
GRAND TOTAL startup REPORTING AND RECORDKEEPING BURDEN For Rule		649,304.00		\$8,887,391.64	\$11,749,477.47

The overall estimated cost to the respondent for annual startup data collection with fully loaded wages is \$11,749,477.47 which includes \$8,887,391.64 ongoing cost + \$2,862,085.84 (fringe benefits). The cost to the public is based on \$27.83 per hour for a social worker’s salary and \$47.81 for a statistician’s salary. The rate to State agencies after 50 percent reimbursement by FNS is \$13.92 and \$23.91 per hour respectively. Thirty three percent is added to the State agency personnel’s respondent cost to include the cost of their fringe benefits. To estimate public cost, FNS consulted with the U.S. Department of Labor’s median hourly wages for May of 2021; National Occupational Employment and Wage Estimates United States https://www.bls.gov/oes/2021/may/oes_nat.htm.

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 grand total annualized cost to the federal government associated with implementation of all proposed provisions to this rule to include the 380, 380-1, and 275 affected provisions as well as the associated activities with rulemaking itself, information collection, and the regional and

national office implementation activities associated with the rule is \$21,243,057.98 see the breakdown in the charts below.

Table 14A.1 380 and 380-1

Worksheet	Printing Costs	Est. cost Fed Staff Drafting, Reviewing & Approving	Fed Share of State ongoing Costs	Fed share of State Startup costs	Automated System Costs (incl. Monitoring)	Est. Total Federal Costs
FNS 380	\$2,000	\$6,552,358.13	\$6,537,987.24	\$3,644,296.06	\$180,000	\$16,916,641
FNS 380-1	\$2,000	\$1,075,126.17	\$1,181,742.79	\$13,732.16	\$180,000	\$2,452,601
Est. Total Federal Costs						\$19,369,243

The annual cost to the Federal Government to collect, review and use the data for the FNS-380 and FNS-380-1 associated with this rule is estimated to be \$19,369,243 for the first year of implementation and \$15,711,214.32 ongoing annually. These cost include (1) the cost of printing reporting forms; (2) the Federal share of the State’s startup [\$3,658,028] and ongoing burden [\$7,719,730] associated with the rulemaking, as well as the cost for Federal staff to conduct 175,220 hours review and approve the data sent by states \$ 7,627,484.30 [using [2022 Federal Salary Table](#) for GS 12/6 annual each \$ 5,734,950.60plus \$1,892,533.70for fringe benefits] to draft, review and approve the data, and data entry; and (3) automated system costs [includes system monitoring and salaries]. These costs are operational and automation maintenance costs.

Table 14A.2 275 Regulations Collection

ICR	Printing Costs	Est. Costs Fed Staff Drafting, Reviewing & Approving	Fed Share of State ongoing Costs	Fed share of State Startup costs	Automated System Costs (incl. Monitoring)	Est. Federal Costs
275	\$0.00	\$398,879.86	\$89,912.44	\$67,402.54	\$0.00	\$556,194.84

Table 14A.3 275 Regulations- R.O Salary Costs

Requirement- Regional Offices	Total Responses Per Year	Hrs Per Response	Regional Office Respondents per Response	Regional Ofc Salary GS 11/2	Regional Office Salary Costs	Fringe benefits (33%)	TOTAL salary
Sampling Plan	53	24	7	\$28.21	\$251,181.84	\$82,890.01	\$334,071.85
Arbitration	36	5	1	\$28.21	\$5,077.80	\$1,675.67	\$6,753.47
Good Cause	1	0	0	\$28.21	\$0.00	\$0.00	\$0.00
New Investment Plan Template Form FNS 74 A	9	8	1	\$28.21	\$2,031.12	\$670.27	\$2,701.39
New Investment Plan Template 74B	18	4	1	\$28.21	\$2,031.12	\$670.27	\$2,701.39
Total R.O Salary Costs					\$260,321.88	\$85,906.22	\$346,228.10

Table 14A.4 275 Regulations- N.O. Salary Costs

Requirement- National Office	Total Responses Per Year	Hrs Per Response	National Office Respondents per Response	National Ofc Salary GS 12/2 (14/1 for arbitrator)	National Office Base Salary Costs	Fringe benefits (33%)	TOTAL salary
Sampling Plan	53	0	0	\$32.73	\$0.00	\$0.00	\$0.00
Arbitration	36	18	1	\$45.99	\$29,801.52	\$9,834.50	\$39,636.02
Good Cause	1	50	4	\$32.73	\$6,546.00	\$2,160.18	\$8,706.18
New Investment Plan Form FNS 74 A	9	4	2	\$32.73	\$2,356.56	\$777.66	\$3,134.22
New Investment Plan Form FNS 74 B	18	1.5	1	\$32.73	\$883.71	\$291.62	\$1,175.33
Total N.O Salary Costs					\$39,587.79	\$13,063.97	\$52,651.76

The annualized cost to the federal government associated with the first year of implementation of the 275 component of rulemaking is estimated at \$556,194.84 (\$488,792.30 ongoing and \$67,402.54 startup). This is an operational cost only as there are no automation costs to the federal government for this function.

Table 14A.5- Regional Office and National office Costs associated with Implementation.

Requirement- Regional Office Implementation	Total Responses Per Year	Hrs Per Response	Regional Office Respondents per Response	Regional Ofc Salary (12/2)	Regional Office salary Base Costs	Fringe benefits (33%)	TOTAL salary
a .regional office Program Analyst GS 12 Step 2 Estimates of Annualized Cost to Federal Government for being trained on new rule provisions	60	80	1	\$33.82	\$162,336	\$53,570.88	\$215,906.88

Table 14A.6- National Office Costs associated with Implementation Requirement- National Office rulemaking/ ICB/implementation.

	Total Responses Per Year	Hrs Per Response	National Office Respondents per Response	National Ofc Salary (13/1,14/1,0r15/1)	National Office Base Salary Costs	Fringe benefits (33%)	TOTAL salary
a .Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	1	120	1	\$38.92	4,670.40	1,541.23	6,211.63
b. Program Branch Chief Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	1	30	1	\$45.99	1,379.70	455.30	1,835.00
c. Program Division Director Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	1	10	1	\$54.09	540.90	178.50	719.40
d .Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving RULE	1	160	2	\$38.92	6,227.20	2,054.98	8,282.18
e. Program Branch Chief Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving RULE	1	40	1	\$45.99	1,839.60	607.07	2,446.67
f. Program Division Director Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving	1	20	1	\$54.09	1,081.80	356.99	1,438.79

RULE							
g .Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for Implementing rule	1	2080	11	\$38.92	80,953.60	26,714.69	107,668.29
h. Program Branch Chief Estimates of Annualized Cost to Federal Government for Implementing rule	1	1040	1	\$45.99	47,829.60	15,783.77	63,613.37
						Total N/O a-h	\$192,215.32

The annualized cost to the federal government associated with implementation of the provisions of this rule for regional office employees is \$215,906.88. This is to provide 80 hours of training associated with the new provisions of this rule for sixty QC staff using a GS 12 step 2 and including 33% to the base wage (*Table 14A.5*).

The annualized cost to the federal government associated with the drafting, reviewing & approving of this associated ICR for this rule for national office employees is \$8,766.03. This includes 120 hours for a GS 13 Step 1 staff to complete the steps associated with drafting and revising the ICR, 30 hours for a GS 14 Step 1 supervisor to review and approve the ICR, and 10 hours for a GS 15 Step 1 director to approve the ICR (*Table 14A.6 items a,b,c*).

The annualized cost to the federal government associated with the drafting, reviewing & approving of the proposed rule associated with this ICR for national office employees is \$20,449.81. This includes 320 hours for two GS 13 Step 1 staff to complete the steps associated with drafting and revising the rule, 40 hours for a GS 14 Step 1 supervisor to review and approve

the rule, and 20 hours for a GS 15 Step 1 director to review and approve the rule (**Table 14A.6 items d,e,f**).

The annualized cost to the federal government associated with the implementation of the provisions of this rule for national office employees is \$451,902.09. This includes 6,264 hours for twelve GS 13 Step 1 staff to draft and revise any guidance associated with implementation of the rulemaking including but not limited to Q&As, implementation memos, policy revisions of the FNS 310 Handbook for QC reviewers, the FNS 315, the regional office's handbook for proving oversight of states on the QC review process as well as the sampling plans, and the FNS 311 handbook- the State's statistical guide for setting up State sampling plans, and any training tools on the new policies, as well as the time spent on logistics and the actual training of all the FNS regional staff on the revised QC progress. The costs also includes \$127,654.90 for 2,087 hours for a GS 14 Step 1 supervisor to manage the staff work associated with implementing the rule (**Table 14A.6 items g,h**).

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.

The current burden inventories for components within this collection are found in OMB-0584-0074, Expiration Date: 07/31/2025; 0584-0299, Expiration Date: 09/30/2026 and 0584-0303, Expiration Date: 7/31/2025. FNS will publish a separate action in the Federal Register announcing OMB's approval. This rulemaking for **0584-AE79, Reform Provisions for the Supplemental Nutrition**

Assistance Program's Quality Control will cause a revision of a total of 652,305 reporting and recordkeeping burden hours for the first year of implementation for this rule. 194,361 of those hours are specific changes associated with the rule and are discussed below and in the charts that follow.

For OMB control number 0584-0074, FNS 380 this is an existing collection with OMB approval resulting from program changes associated with rulemaking. The current burden inventory for this OMB control number is 405,996 hours; we are requesting 582,760 burden hours (an increase of 176,764 hours) and 582,760 total annual responses for this collection. This program change reflects a decrease of 20,151 ongoing annual burden hours and an increase of 196,915 startup annual burden hours due to rulemaking (**Table 15A.1**).

For OMB control number 0584-0299, FNS 380-1 this is an existing collection with OMB approval resulting from program changes associated with rulemaking. The current burden inventory for this OMB control number is 49,119 hours; we are requesting 64,596 burden hours (an increase of 15,477 hours) and 118,663 total annual responses for this collection. This program change reflects an increase of 14,735 ongoing annual burden hours and an increase of 742 startup annual burden hours due to rulemaking (**Table 15A.2**).

For OMB control number 0584-0303, FNS 275, this is an existing collection with OMB approval resulting from program changes associated with rulemaking. The current burden inventory for this OMB control number is 2,829 hours; we are requesting 4,949 burden hours and 299 total annual

responses for this collection. This program change reflects no change in ongoing annual burden hours and an increase of 2,120 startup annual burden hours due to rulemaking (*Table 15A.3*).

Table 15A.1

OMB Control Number 0074; EXPIRES 07/31/2025		rule related revised ongoing	rule related New startup
ESTIMATED TOTAL NO. RESPONDENTS	45,550	59,199	687
ESTIMATED AVERAGE NO. RESPONSES PER RESPONDENT	6.991833	8.992010	345.295488
ESTIMATED TOTAL ANNUAL RESPONSES	318,478.00	532,318.00	237,218
ESTIMATED AVERAGE HOURS PER RESPONSE	1.27	0.72	0.83
ESTIMATED TOTAL ANNUAL BURDEN HOURS REQUIRED TO CARRY OUT ACTIVITIES	405,996	385,845	196,915.17
CURRENT OMB INVENTORY IN 0584-0074	405,996	405,996	
	6,150,628	0	(20,151)
			196,915

Table 15A.2

OMB Control Number 0299 exp 09/30/2026 current		rule related revised ongoing	rule related New startup
ESTIMATED TOTAL NO. RESPONDENTS	53.00	53	371
ESTIMATED AVERAGE NO. RESPONSES PER RESPONDENT	1,716.868	2,231.920	1.000
ESTIMATED TOTAL ANNUAL RESPONSES	90,994.000	118,291.760	371
ESTIMATED AVERAGE HOURS PER RESPONSE	0.53980	0.53980	2.00000
ESTIMATED TOTAL ANNUAL BURDEN HOURS REQUIRED TO CARRY OUT ACTIVITIES	49,119.000	63854	742
CURRENT OMB INVENTORY 0584-0299	49,119	49,119	
*DIFFERENCE DUE TO RULEMAKING	0	14,735	742

Table 15A.3

OMB Control Number 0303 exp 07/31/2025	current	rule related revised ongoing	rule related New startup
ESTIMATED TOTAL NO. RESPONDENTS	53.00	53	53
ESTIMATED AVERAGE NO. RESPONSES PER RESPONDENT	4.6415	4.6415	1.0000
ESTIMATED TOTAL ANNUAL RESPONSES	246	246	53
ESTIMATED AVERAGE HOURS PER RESPONSE	11.5000	11.5000	40.0000
ESTIMATED TOTAL ANNUAL BURDEN HOURS REQUIRED TO CARRY OUT ACTIVITIES	2,829	2829	2120
CURRENT OMB INVENTORY 0584-0303	2,829	2829	
*DIFFERENCE DUE TO RULEMAKING	0	0	2,120

Estimated Total Difference due to rulemaking needed to be added to existing OMB control Nos.	0
Estimated Total Start-up burden hours for OMB Control Nos. 0074; 0299 & 0303	199,777.17

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.

FNS 380-1 (OMB Control Number: 0584-0299)

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 is 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 at <https://partnerweb.usda.gov>.

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 or 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.