

Appendix B: Burden Narrative
OMB 0584-NEW for AE79

Interim Final rule, with request for comments: Reform Provisions for the Supplemental Nutrition Assistance Program's Quality Control System (RIN 0584-AE64)]

**Reporting Requirements--Part 275.12
Active Case Reviews- FNS 380, OMB 0584-0074**

State Agencies Burden Requirements

275.12 (b) Household Case Record Review.

QC reviewers shall examine the household case record to identify the specific facts relating to the household's eligibility and basis of issuance. The case record review includes all information applicable to the eligibility action under review, including the application and, as applicable, the periodic report and worksheet in effect as of the review date. The reviewer shall utilize information obtained through the case record review to complete column (2) of the Form FNS-380, and to tentatively plan the content of the field investigation.

Ongoing burden hours: FNS estimates that 53 State agencies will review a total of 59,146 household case records for QC at a rate of approximately 2 hours per case, resulting in an estimated total of 118,292 ongoing annual burden hours.

The previous burden for this activity was 136,490.37 burden hours which reflects a decrease of -18,199 burden hours due to program changes.

Startup burden hours: No implementation startup hours are anticipated.

275.12 (c) Field investigation.

A full field investigation shall be conducted for all active cases selected in the sample month. A full field investigation includes a review of any information pertinent to a particular case which is available through the State Income and Eligibility Verification System (IEVS) as specified in §272.8 of this chapter. The field investigation will include interviews with the head of household, spouse, or authorized representative; contact with collateral sources of information; and any other materials and activity pertinent to the review of the case. The scope of the review shall not extend beyond the examination of household circumstances which directly relate to the determination of household eligibility and basis of issuance status. The reviewer shall utilize information obtained through the field investigation to complete column (3) of the Form FNS-380.

Ongoing burden hours: FNS estimates that 53 State agencies will conduct a total of

59,146 QC field investigations at a rate of approximately 2 hours per case, resulting in an estimated total of 118,292 annual burden hours.

The previous burden for this activity was 159,238.77 burden hours which reflects a decrease of -40,947 burden hours due to program changes.

Startup burden hours: No implementation startup hours are anticipated.

275.12 (c)(1) Personal interviews

During the personal interview with the participant, the reviewer shall: (i) Explore household circumstances as they affect each factor of eligibility and basis of issuance; (ii) Establish the composition of the household; (iii) Request and review with the household documentary evidence in the case file, as well as those in the household's possession and secure information about collateral sources of verification; and (iv) Elicit from the participant names of collateral contacts. The reviewer shall use, but not be limited to, these designated collateral contacts. If required by the State, the reviewer shall obtain consent from the head of the household to secure collateral information. Under no circumstances, however, will the reviewer secure or attempt to secure consent if not required by State law.

Ongoing burden hours: FNS estimates that 53 State agencies will interview a total of 59,146 SNAP households for QC at a rate of approximately .5 hours per case, resulting in an estimated total of 29,573 annual burden hours.

The previous burden for this activity was 22,748.40 burden hours which reflects an increase of 6,825 burden hours due to program changes.

Startup burden hours: No implementation startup hours are anticipated.

275.12 (d)(1) Variance identification

The State reviewer shall identify any element of a basic program requirement or the basis of issuance which varies (i.e., information from review findings which indicates that policy was applied incorrectly and/or information verified by the reviewer that differs from that used in the eligibility action under review). For each element that varies, the reviewer shall determine whether the variance was State agency or participant caused. The results of these determinations shall be coded and recorded in column (4) of the Form FNS-380.

Ongoing burden hours: FNS estimates that 53 State agencies will identify variances for a total of 59,146 QC cases at a rate of approximately .5 hour per case, resulting in an

estimated total of 29,573 annual burden hours.

The previous ongoing burden for this activity was 40,947.11 burden hours which reflects a decrease of -11,374 burden hours due to program changes.

Startup burden hours: FNS estimates that QC reviewers in all 53 State agencies will require an additional .75 hours per case to properly implement the changes to the variance identification procedures outlined in this rule, resulting in an estimated 44,359.41 additional startup hours. Therefore, for the first year of implementation, the variance identification reporting burden is estimated to be 73,932.63 burden hours.

275.12 (e) Error analysis

State reviewers analyze all appropriate variances in completed cases, which are based upon verified information and determine whether such cases are either eligible, eligible with a basis of issuance error, or ineligible. The review of an active case determined ineligible shall be considered completed at the point of the ineligibility determination. For households determined eligible, the review shall be completed to the point where the correctness of the basis of issuance is determined, except in the situations outlined in paragraph (g) of this section. The determination of a household's eligibility and the correctness of the basis of issuance shall be determined based on data entered on the computation sheet as well as other information documented on other portions of the Form FNS-380, as appropriate.

Ongoing burden hours: FNS estimates that reviewers in 53 State agencies will analyze a total of 59,146 QC cases for errors at a rate of approximately .5 hour per case, resulting in an estimated total of 29,573 annual burden hours.

The previous ongoing burden for this activity was 22,748.40 burden hours which reflects an increase of 6,825 burden hours due to program changes.

Startup burden hours: FNS estimates that QC reviewers in all 53 State agencies will require an additional .75 hours per case to properly implement the changes for error analysis, resulting in an estimated 44,359.41 additional startup hours. Therefore, for the first year of implementation, the error analysis reporting burden is estimated to be 73,932 burden hours.

275.12 (f) Reporting of review findings

All information verified to be incorrect during the review of an active case shall be reported to the State agency for appropriate action on an individual case basis. This

includes information on all variances in elements of eligibility and basis of issuance in both error and nonerror cases. In addition, the reviewer shall report the review findings on the Form FNS-380-1.

Ongoing burden hours: FNS estimates that 53 State agencies will report case findings for a total of 59,146 QC cases at a rate of approximately .25 hour per case, resulting in an estimated total of 14,786 annual burden hours.

The previous burden for this activity was 22,748.50 ongoing burden hours which reflects an increase of 6,824.50 ongoing burden hours due to program changes.

Startup burden hours: FNS estimates that QC reviewers in all 53 State agencies will require an additional .50 hours per case to properly implement the changes for reporting case review findings from this rule, resulting in an estimated 29,572.94 additional startup hours. Therefore, for the first year of implementation, the reporting of review findings burden is estimated to be 44,358.94 burden hours.

275.12(d)(3) Reporting Findings to Local Offices

State reviewers must report all variances found in a QC review to the local office. FNS estimates that 53 State agencies will report variances on a total of 59,146 QC cases. It is estimated that each case will require approximately .5 hour per to report on the variances, resulting in an estimated total of 29,573 annual burden hours. No implementation startup hours are anticipated.

Ongoing burden hours: FNS estimates that 53 State agencies will report case findings for a total of 59,146 QC cases at a rate of approximately .25 hour per case, resulting in an estimated total of 14,786 annual burden hours.

This was not captured in the previous burden hours, which reflects an increase of 14,786 ongoing burden hours due to program changes.

Startup burden hours: FNS estimates that QC reviewers in all 53 State agencies will require an additional .75 hours per case to properly implement the changes for analyzing errors from this rule, resulting in an estimated 44,359.41 additional startup hours. Therefore, for the first year of implementation, the reporting of review findings burden is estimated to be 59,145.41 burden hours.

275.12 Training on New Actives Process

Startup Burden Hours: In the first year of implementation, FNS estimates that 634 State QC reviewers will undergo training on the new actives review process for a total of 40 hours each, resulting in an estimated total of 25,360 burden hours.

275.21(b)(1)Training on FNS 380 in SNAPQCS

Startup Burden Hours: In the first year of implementation, FNS estimates that 371 State QC reviewers will undergo training on using the FNS 380 in SNAPQCS for a total of 24 hours each, resulting in an estimated total of 8,904 burden hours.

Individuals/Households Burden Requirements

275.12 (c)(1) Personal Interviews

Households must participate with QC and conduct a personal interview with the QC reviewer. During the personal interview with the participant, the reviewer shall: (i) Explore household circumstances as they affect each factor of eligibility and basis of issuance; (ii) Establish the composition of the household; (iii) Request and review with the household documentary evidence in the case file, as well as those in the household's possession and secure information about collateral sources of verification; and (iv) Elicit from the participant names of collateral contacts. The reviewer shall use, but not be limited to, these designated collateral contacts. If required by the State, the reviewer shall obtain consent from the head of the household to secure collateral information. Under no circumstances, however, will the reviewer secure or attempt to secure consent if not required by State law.

Ongoing burden hours: FNS estimates that 59,146 SNAP households will be interviewed by QC at a rate of approximately .5 hours per interview, resulting in an estimated total of 29,573 annual burden hours.

The previous ongoing burden for this activity was 22,748.50 burden hours which reflects an increase of 6,825 ongoing burden hours due to program changes.

Startup burden hours: No implementation startup hours are anticipated.

Recordkeeping Requirements--Part 275.4

275.4 Record Retention FNS 380

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 Forms FNS-380, Worksheet for Supplemental Nutrition Assistance Program, FNS-380-1, Quality Control Review Schedule, 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.

The previous ongoing burden for this activity was 1,073.73 burden hours which reflects an increase of 322.11 ongoing burden hours due to program changes.

Startup burden hours: No implementation startup hours are anticipated.

**Reporting Requirements--Part 275.12
Active Case Reviews- FNS 380-1, OMB 0584-0299**

State Agencies 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.

The previous ongoing burden for this activity was 48,044 burden hours which reflects an increase of 14,413.22 ongoing burden hours due to program changes.

Startup Hours: No implementation startup hours are anticipated.

275.21(b)(1) Train State QC reviewers how to use the FNS 380-1 in SNAPQCS

Startup Burden Hours: In the first year of implementation, FNS estimates that 371

State QC reviewers will undergo training on using the FNS 380-1 in SNAPQCS for a total of 2 hours each, resulting in an estimated total of 742 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 Forms FNS-380, Worksheet for Supplemental Nutrition Assistance Program, FNS-380-1, Quality Control Review Schedule, 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.

The previous ongoing burden for this activity was 1,073.73 burden hours which reflects an increase of 322.11 ongoing burden hours due to program changes.

Startup burden hours: No implementation startup hours are anticipated.

Reporting Requirements--Part 275.11 State Sampling Plans- FNS 275, OMB 0584-0303

State Agencies Burden Requirements

275.11(a)(1)-(a)(2) Sampling Plan

The sampling plan shall include a complete description of the frame, the method of sample selection, and methods for estimating characteristics of the population and their sampling errors that the State agency will apply when conducting its quality control procedures. The description of the sample frames shall include: source, availability, accuracy, completeness, components, location, form, frequency of updates, deletion of cases not subject to review, and structure. The description of the methods of sample selection shall include procedures for: estimating caseload size, overpull, computation of sampling intervals and random starts (if any), stratification, identifying sample cases, correcting over-or undersampling, and monitoring sample selection and assignment. The

State agency shall provide FNS with a time schedule for completion of each step in the sampling procedures contained in this section. The FNS 311 Handbook is used by State agencies as a reference tool for creating their sampling plans both initially and annually.

Ongoing burden hours: FNS estimates that 53 State agencies will create 1 QC sampling plan at a rate of approximately 20 hours per plan, resulting in an estimated total of 1060 ongoing annual burden hours. These ongoing hours include fifteen minutes annually for a State agency to reference the FNS 311 Handbook as needed when updating their sampling plans.

The previous ongoing burden for this activity was 1060 burden hours which reflects no change in burden hours from the previous submission.

Startup burden hours: FNS estimates all 53 State agencies will require an additional 40 hours per plan to implement the new sampling procedures outlined in this rule, resulting in an estimated 2,120 additional startup hours. Therefore, for the first year of implementation, the sampling plan reporting burden is estimated to be 4,946 burden hours.

State Agencies Recordkeeping Requirements--Part 275.11

275.4 Record Retention- FNS 275

As part of the Performance Reporting System, sampling plans must be maintained so they are readily accessible for the required timeframe of three years past fiscal closure.

Ongoing burden hours: FNS estimates that 53 State agencies will keep records for 1 QC sampling plan at a rate of approximately 0.0236 hour per plan, resulting in an estimated total of 1.2508 annual burden hours.

The previous ongoing burden for this activity was 1.2508 burden hours which reflects no change in ongoing burden hours due to rulemaking.

Startup burden hours: No implementation startup hours are anticipated.