

**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<br>Information<br>Collection<br>Package | State agency<br>Reporting<br>Requirement | Current<br>Hrs Per<br>Response | Too<br>High?<br>Too<br>Low? or<br>Accurate | Reason(s) why?                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------|------------------------------------------|--------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OMB<br>0584-0074                            | FNS Form 380                             | 8.9                            | Too Low                                    | 30 minutes for interview time is not reasonable. The calculation does not appear to take into consideration the SQCR travel to conduct face-to-face interviews with clients. Our estimate (rough) is Travel/Interview 3 hours; gathering, comparing, analyzing, and 380 completion, is 7 hours for 10 hrs per response. |

Hi Pat and Samantha, Attached

is NH's reply. Have a great day!

*Denise*

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](#)

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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:** [Moore, Pat; Fettig, Samantha](#)  
**Cc:** [Wilkinson, Tiffany - FNS](#)  
**Subject:** State Agency Reporting-Burden Estimates  
**Date:** Friday, November 1, 2019 1:36:32 PM  
**Attachments:** [Appendix C - 60 Day Notice.pdf](#)  
[Appendix C - OMB 0584-0299 60 Day Notice Publication.pdf](#)  
[OMB 0584-0303 275 SS after OIRA 7-14-17OFFICIAL.docx](#)

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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)
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                    |                                |                |
| OMB 0584-0303                      | Sampling Plan                              | 5                        |                                |                |
|                                    | Arbitration                                | 24                       |                                |                |
|                                    | Good Cause                                 | 160                      |                                |                |
|                                    | New Investment Plan Template Form FNS 74 A | 32                       |                                |                |
|                                    | New Investment                             |                          |                                |                |

|  |                                |   |  |  |
|--|--------------------------------|---|--|--|
|  | Plan Template<br>Form FNS 74 B | 5 |  |  |
|--|--------------------------------|---|--|--|

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](mailto: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