

## Appendix C: Burden Narrative

### OMB Control Number 0584-0034: FNS-245, SNAP Negative Case Action Review Schedule

This collection is a request to revise an existing information collection.

#### Reporting Requirements--Part 275.13 Review of Negative Cases- FNS 245, OMB 0584-0034

#### State Agencies Burden Requirements

##### (b) Household case record review.

The reviewer shall examine the household case record and verify through documentation in it whether the reason given for the denial, suspension, or termination is correct. Through the review of the household case record, the reviewer shall complete the household case record sections and document the reasons for denial, suspension or termination on the Negative Quality Control Review Schedule, Form FNS-245.

**Ongoing burden hours:** FNS estimates that 53 State agencies will review a total of 35,446 household case records for negative reviews at a rate of approximately 1.5 hours per case, resulting in an estimated total of 53,169 ongoing annual burden hours.

##### (c) Error analysis.

(1) A negative case shall be considered valid if the reviewer is able to verify through documentation in the household case record that a household was correctly denied, suspended, or terminated from the program in accordance with the reason for the action given by the State agency in the notice. Whenever the reviewer is unable to verify the correctness of the State agency's decision to deny, suspend, or terminate a household's participation through such documentation, the QC reviewer may contact the household or a collateral contact to verify the correctness of the specific negative action under review. If the reviewer is unable to verify the correctness of the State agency's decision to deny, suspend, or terminate the case for the specific reason given for the action, the negative case shall be considered invalid.

(2) The reviewer shall exclude a variance when the State agency erroneously denied, suspended or terminated a household's participation based on an erroneous verification of alien documentation by the Immigration and Nationalization Services (INS) Systematic Alien Verification for Entitlements (SAVE) Program. The reviewer shall exclude the variance only if the State agency properly used SAVE, and the State agency provides the reviewer with:

- (i) The alien's name;
- (ii) The alien's status; and
- (iii) Either the Alien Status Verification Index (ASVI) Query Verification Number or the

INS Form G-845, as annotated by INS.

**Ongoing burden hours:** FNS estimates that 53 State agencies will review a total of 35,446 household case records for negative reviews at a rate of approximately 1.15 hours per case, resulting in an estimated total of 40,762.90 ongoing annual burden hours.

(d) Reporting of review findings.

When a negative case is incorrect, this information shall be reported to the State agency for appropriate action on an individual case basis, such as re-computation of the allotment and restoration of lost benefits. In addition, the reviewer shall code and record the error determination on the Negative Quality Control Review Schedule, Form FNS-245.

**Ongoing burden hours:** FNS estimates that 53 State agencies will review a total of 35,446 household case records for negative reviews at a rate of approximately 0.25 hours per case, resulting in an estimated total of 8,861.50 ongoing annual burden hours.

(e) Disposition of case review.

Each case selected in the sample of negative cases must be accounted for by classifying it as completed, not completed, or not subject to review. These case dispositions shall be coded and recorded on the Negative Quality Control Review Schedule, Form FNS-245.

(1) Cases reported as not complete. Negative cases shall be reported as not completed if the reviewer, after all reasonable efforts, is unable to locate the case record. In no event, however, shall any negative case be reported as not completed solely because the State agency was unable to process the case review in time for it to be reported in accordance with the timeframes specified in §275.21(b)(2), without prior FNS approval. This information shall be reported to the State agency for appropriate action on an individual case basis.

(2) Cases not subject to review. Negative cases which are not subject to review, if they have not been eliminated in the sampling process, shall be eliminated in the review process. In addition to cases listed in §275.11(f)(2), these shall include:

- (i) A household which was dropped as a result of a correction for oversampling;
- (ii) A household which was listed incorrectly in the negative frame.

**Ongoing burden hours:** FNS estimates that 53 State agencies will review a total of 35,446 household case records for negative reviews at a rate of approximately 0.25 hours per case, resulting in an estimated total of 8,861.50 ongoing annual burden hours.

## **Recordkeeping Requirements--Part 275.4**

### 275.4 Record Retention FNS 245

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 Case Action 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 35,446 QC cases at a rate of approximately 0.0236 hour per case, resulting in an estimated total of 836.5256 annual burden hours.

### **Third-Party Disclosure:**

There is no third-party disclosure for this information collection request.