

Appendix H: Burden Narrative

This collection is a request to revise an information collection due to interim final rulemaking. FNS plans to publish an interim final rule titled, *AE64- Supplemental Nutrition Assistance Program: Non-Discretionary Quality Control provisions of Title IV of Public Law 115-334*, in the Federal Register and is seeking public comments only on the Paperwork Reduction Action section for the burden activities and estimates involved with this data collection.

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

State Agencies Burden Requirements

275.2(c)(1)(v) Notification to discuss individual cases.

If the QC reviewers discuss individually sampled cases with a contractor, the State must document, within the case file, the contents of the discussion and any action taken by the State as a result of the discussion. If the discussion occurs orally, FNS shall be given notice 24 hours in advance of the discussion and shall be allowed to participate in the discussion. If the discussion occurs in writing, the State must ensure that FNS is copied on all written correspondence discussing individually sampled cases.

Ongoing burden hours: FNS estimates that 5 State agencies will notify FNS of discussions of cases with contractors once at a rate of approximately 0.08 hours per response, resulting in an estimated total of 0.4 ongoing annual burden hours.

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 45,497 household case records for QC at a rate of approximately 3 hours per case, resulting in an estimated total of 136,491 ongoing annual burden hours.

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 45,497 QC field investigations at a rate of approximately 3.5 hours per case, resulting in an estimated total of 159,239.50 annual burden hours.

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 45,497 SNAP households for QC at a rate of approximately .5 hours per case, resulting in an estimated total of 22,748.50 annual burden hours.

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 45,497 QC cases at a rate of approximately .9 hour per case, resulting in an estimated total of 40,947.3 annual 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 45,497 QC cases for errors at a rate of approximately .5 hour per case, resulting in an estimated total of 22,748.50 annual burden hours.

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 45,497 QC cases at a rate of approximately 0.0236 hour per case, resulting in an estimated total of 1,073.73 annual burden hours.

Third-Party Disclosure:

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

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 45,497 SNAP households will be interviewed by QC at a rate of approximately .5 hours per interview, resulting in an estimated total of 22,748.50 annual burden hours.

Recordkeeping:

There is no recordkeeping burden imposed on Individuals/Households in this information collection request.

Third-Party Disclosure:

There is no third-party disclosure for Individuals/Households in this information collection request.