

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0299:

FNS-380-1, Supplemental Nutrition Assistance Program's Quality Control Review

Schedule

Tiffany Wilkinson

Program Analyst

Supplemental Nutrition Assistance Program

7 CFR Part 275

USDA, Food and Nutrition Service

1320 Braddock Place

Alexandria, Virginia 22314

July 2023

Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....	3
A2. PURPOSE AND USE OF THE INFORMATION.....	3
A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....	6
A4. EFFORTS TO IDENTIFY DUPLICATION.....	6
A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....	7
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....	7
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....	7
A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.....	8
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....	10
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....	10
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....	11
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....	12
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....	15
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....	15
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....	17
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....	17
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....	18
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....	18

Appendices

- A. FNS 380-1 QC Review Schedule with Coding Instructions
- B. Excel Burden Chart
- C. SNAP-QCS Privacy Impact Analysis (PIA)
- D. SNAP SORNS
- E. Public Comments and Responses from 60-day notice
 - 1. Comment from D. Rosenbaum
 - a) Response to D. Rosenbaum
 - 2. Comment from L. Schweigert
 - a) Response to L. Schweigert
- F. Comments and responses to burden inquiry- outside consultants
 - 1. C. Thompson, Texas Quality Management and Support Director
 - 2. QC TAG Feedback
- G. Food and Nutrition Act of 2008, as amended- QC Provisions
- H. 7 CFR 275.10-275.14, QC reviews
- I. 7 CFR 275.20-275.22, Responsibilities for Reporting on Program Performance
- J. SNAP-QCS FNS 380-1 Automated Input Screens
- K. 7 CFR 275.1-275.4, Performance Reporting System-Administration

Terms of Clearance:

The PRA language in the OMB burden statement was updated with this revision to reflect the correct address for sending PRA comments. The description and nature of the content of the form are discussed in item A2 and the privacy of the information is discussed in part A10 and of this supporting statement.

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.

This information collection request is for a revision of the approved collection, OMB 0584-0299, FNS 380-1, Supplemental Nutrition Assistance Program (SNAP) Quality Control Review Schedule. As required by the Food and Nutrition Act of 2008, as amended (the Act), FNS is required to collect Quality Control (QC) data. State agencies are required to perform QC reviews for SNAP. The FNS-380-1, Quality Control (QC) Review Schedule(Appendix A), was developed by 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. The legislative basis for the QC system is in Section 16 of the Act (Appendix G). Part 275, Subpart C, of 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) (Appendix H) and 7 CFR 275.21(Appendix I).

The legislative basis for the recordkeeping requirements is Section 11(a) of the Act. SNAP regulations, in 7 CFR 272.1(f) and 7 CFR 275.4 (Appendix K), specify that program records must be retained for a period of three years from the month of origin.

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.

State Agencies Reporting Burden Requirements (Appendix H)

275.(12)(f) Reporting requirements- FNS 380-1

Reviewers must report review findings on the Form FNS 380-1 (Appendix A/Appendix J), 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 review. If the reviewer determines SNAP allotments were either overissued or underissued to eligible households, the State agency must code and report any variances that directly contributed to the error determination that were discovered and verified during the review.

The items being reported on the FNS 380-1 include a review summary of the active case under review, detailed findings of errors identified in the case, household characteristics including resources, income and deductions, information on each household's member eligibility for SNAP, income details of each household member with income, additional information about both application and recertification timeliness, details on how the QC interview occurred, the

allotment test the error rate is from, and household zip code was added for more accurate information on the household's location.

Ongoing burden hours: FNS estimates that 53 State agencies will report on 45,497 QC cases at a rate of approximately 1.056 hours per case, resulting in an estimated total of 48,044.83 annual burden hours.

275.(14)(d) Review Processing-Schedules- Update and Report to FNS State agency Discretionary Codes

The State agency is required to annually review and update the State agency-specific discretionary codes on the FNS 380-1 and report any updates to FNS.

Ongoing burden hours: FNS estimates that 53 State agencies will each take 3 hours to review and update the state agency discretionary codes on the FNS 380-1. State agencies will also require an additional 0.25 hours to report those updates to FNS annually. FNS estimates the ongoing reporting burden for these provisions total 172.25 hours annually.

State Agencies Recordkeeping Requirements--Part 275.4 (Appendix K)

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 the use of official forms: OMB 0584-0074, Expiration Date: 07/31/2025 FNS-380, Worksheet for Supplemental Nutrition Assistance Program, OMB 0584-0299 Expiration Date: 07/31/2023 (currently under program development in this collection seeking OMB approval) FNS-380-1;

Quality Control Review Schedule, and OMB 0584-0034, Expiration Date: 12/31/2024, 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.

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 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 380-1 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 will be submitted electronically. However, since only 26 State agencies use the full functionality of SNAP-QCS to review cases, some State agencies may use a paper FNS 380-1 prior to submitting to FNS through SNAP-QCS. 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..

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.

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.

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;**

State agencies are required to select, conduct, and report on QC reviews on a monthly, ongoing basis, as discussed in 7 CFR 275.11(c) (Appendix H)

- **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;

SNAP regulations, in 7 CFR 272.1(f) and 7CFR 275.4 (Appendix K) , 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.

Notice of this collection was published in the Federal Register on November 1, 2022 (Vol. 87, No. 210, Pages 65739-65741). We received two comments in response to this notice (Appendices E1 and E2). Both comments were related to the need, utility, quality, and clarity of the information obtained through this collection. The comments from the State of New York required FNS to conduct additional research on a proposed new collection. FNS determined that the proposed change was not practical to make at this time; as a result, it is not included in this renewal. FNS responded to both individuals who made comments and provided contact information (Appendices E1a and E2a). All comments were posted to fdms.gov for the public.

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.

FNS attends annual meetings with the National Association of Program Information and Performance Measurement (NAPIPM) organization, most recently August 15-17, 2022, and holds calls bimonthly with the Quality Control Technical Advisory Group (QC TAG) of this organization, an association made up of state SNAP QC Directors from the 7 FNS regions.

FNS sought feedback from members of the QC TAG from all 7 regions including, but not limited to Cheryl T. (formerly with the State of Texas Department of Health and Human Services) (Appendix F1), Pat M. of the State of North Carolina, leader of the QC TAG (Appendix F2), and Charles B. of the Georgia Division of Family and Children Services (Appendix F2). FNS also held a virtual roundtable discussion on March 11, 2022, requesting coding suggestions to update the FNS 380-1, which included the previously mentioned persons as well as six other State QC supervisors or managers. Commenters and participants submitted suggestions for nature code and causal coding updates. No comments were received about the burden associated with this collection.

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.

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 380-1 contains 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 D).

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 C).

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.

This information collection was reviewed and approved by FNS' acting privacy officer, Wilson J. Moorer on July 24, 2023.

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.

A final rule entitled "Civil Rights Data Collection" was published at Volume 71 FR 28759, Number 96 on May 18, 2006, by FNS. This rule revises the racial and ethnic data collection and reporting using FNS 191 and FNS 101 approved under Food Program Reporting System (FPRS) (OMB Control Number 0584-0594; Expiration 7/31/2025) 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 are allowed to choose more than one race, and State and local agencies are required to report tallies for the new racial categories. When applicants do not provide race or ethnicity data, state agencies use alternative methods for identifying the race or ethnicity of applicants. 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 new racial/ethnic codes.

This information collection was reviewed and approved by FNS' acting privacy officer, Wilson J. Moorer on July 24, 2023.

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.

The overall burden request for this data collection is 49,291 reporting and recordkeeping burden hours and 91,100 total annual responses. There are 53 State agencies required to conduct QC reviews of the active cases as part of the Performance Reporting System.

FNS assumes the same State agencies will maintain these records. The number of active cases that must be selected and reviewed by each State agency during each annual review period is determined based on its size and the State's choice of sampling options. Three reporting requirements are required for the FNS 380-1 annually.

FNS estimates 53 State agencies will need 3 hours to annually update State agency discretionary codes on the FNS 380-1, as well as need 0.25 hours to report to FNS those

updated discretionary codes. In addition, 53 State agencies will need to fill out a 380-1 form for each active case sampled for QC review. For FY 2019, the active caseload was 45,497 cases nationwide which required about 858 form reporting responses per State agency and 1.056 hours per review finding report. The annual estimated reporting total for this collection is 48,217.08 hours.

In addition, each of the 53 State agencies are required to maintain records of the form FNS 380-1 for the recordkeeping requirement. FNS estimates the burden is 0.0236 hours per record for 45,497 records per year and the frequency of responses per respondent is approximately 858 records to keep. We estimate the annual burden for recordkeeping is 1,073.73 hours.

The total estimated annual reporting and recordkeeping burden hours for this collection of information is 49,290.81 hours. The charts on this burden (Appendix B) are below:

Table A12. 1 Reporting Estimates of Hour Burden

Reporting Burden for FNS 380-1, OMB 0584-0299							
Form Number	Reg. Section	Description of Activity	No. of Respondents	Est. No. of Responses per Respondent	Est. Total Annual Responses	No. Hours per Response	Est. Total Burden Hours
FNS-380-1	275.14(d)	Review Processing-Schedules-Update SA Discretionary Codes	53	1.0000	53	3	159.00
FNS-380-1	275.14(d)	Review Processing-Schedules-Report SA Discretionary code updates	53	1.0000	53	0.25	13.25
FNS-380-1	275.12(f)	Reporting of Review Findings on Form	53	858.4340	45,497	1.0560	48,044.83
Subtotal			53.00	860.43396	45,603.00	1.0573	48,217.08

Table A12. 2 Record Keeping Burden

Recordkeeping Burden for FNS 380-1, OMB 0584-0299							
---	--	--	--	--	--	--	--

Form Number	Reg. Section	Description of Activity	No. of Record keepers	Est. No. of Records per Record keeper	Est. Total Annual Responses	No. Hours per Record to be Maintained	Est. Total Burden Hours
FNS-380-1	275.4	Record Retention	53	858.433962	45,497	0.0236	1073.7292

Table A12. 3 Grand Total – Reporting and Record Keeping Burden

Description of Activity	No. of Record keepers	Est. No. of Records per Record keeper	Est. Total Annual Responses	No. Hours per Record to be Maintained	Est. Total Burden Hours
Grand Total Reporting and Recordkeeping Burden	53.00	1,718.87	91,100.00	4.33	49,290.81

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

Table A12. 4 Estimates of Annualized Cost to Respondents

Financial Burden for State Agencies FNS 380-1, OMB 0584-0299								
Type of Respondents	Reg Citation	Activity	Number of responses	Average Time Per Response	Hourly Wage Rate (50% for State Agency Staff – not Households)	Total without loaded wages	Fully loaded wages	Total Costs
Reporting Burden								
State Agencies	275.14(d)	Review Processing-Schedules-Update SA Discretionary Codes	53	3	\$14.29	\$2,272.11	\$749.80	\$3,021.91
State Agencies	275.14(d)	Review Processing-Schedules-Report SA Discretionary code updates	53	0.25	\$14.29	\$189.34	\$62.48	\$251.83
State Agencies	275.12(f)	Reporting of Review Findings	45,497	1.0560	\$14.29	\$686,560.65	\$226,565.01	\$913,125.66
Total Reporting Burden						\$689,022.10	\$227,377.29	\$916,399.40
Recordkeeping Burden								

State Agencies	275.4	Record Retention	45,497	0.0236	\$14.29	\$12,772.01	\$4,214.76	\$16,986.77
Reporting and Recordkeeping Costs						\$701,794.11	\$231,592.06	\$933,386.17

The overall estimated ongoing cost to the respondent for this collection with fully loaded wages is \$933,386.17, which includes \$701,794.11 base annual cost + \$231,592.06 (FNS adds 33 percent to the respondent’s cost to account for State agency staff’s fringe benefits). The cost to the public is based on \$28.58 per hour. The rate to State agencies after 50 percent reimbursement by FNS is \$14.29. FNS determine the cost to respondent by multiplying the hourly wage rate by the total annual burden hours for each activity. To estimate public cost, FNS used the U.S. Department of Labor’s Bureau of Labor Statistics median hourly wage for May 2022 National Occupational and Employment and Wage Estimates – 21-1020 Social Workers, (https://www.bls.gov/oes/2022/may/oes_nat.htm).

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.

There are no capital/start-up or ongoing operation/maintenance costs to respondents or recordkeepers associated with this information collection.

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.

Table A14. 1 Estimates of Annualized Cost to Federal Government

Activities	Annual	Hours	Costs or	Total Cost	Fringe	Overall Cost w/
------------	--------	-------	----------	------------	--------	-----------------

	Responses	Spent on Collection	Hourly Wage Rage		Benefits Cost for Staff (0.33)	Fringe Benefits for Staff
1. Printing Cost			\$2,000.00	\$2,000.00	N/A	\$2,000.00
2. 50% Reimbursement Cost to States for reporting & recordkeeping administrative cost				\$701,794.11	\$231,592.06	\$933,386.17
3. 60 Regional Federal Staff (GS 12 Step 5) review of 380-1 submissions	17597	1.056	\$39.75	\$738,651.67	\$243,755.05	\$982,406.72
4a .Program Analyst GS 13 Step 1 Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR	1	80	\$40.51	\$3,240.80	\$1,069.46	\$4,310.26
4b. Program Branch Chief Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR 14/1	1	10	\$47.87	\$478.70	\$157.97	\$636.67
4c. Program Division Director Estimates of Annualized Cost to Federal Government for drafting, reviewing & approving ICR 15/1	1	5	\$56.31	\$281.55	\$92.91	\$374.46
5. Automated System Cost (includes fringe benefits in fixed rate Contractor Monitoring)	1	N/A	\$180,000.00	\$180,000.00	N/A	\$180,000.00
Grand Total Cost to Government			\$182,184.44	\$1,626,446.83	\$476,667.45	\$2,103,114.29

The annual cost to the Federal Government to collect, review and use the data for the FNS-380-1 is estimated to be \$2,103,114.29 (including fully loaded wages). This cost includes (1) the cost of printing reporting forms [\$2,000]; (2) State agencies' total costs for reporting and recordkeeping with fringe benefits[\$933,386.17]; (3) the cost for 60 Federal staff earning a General Schedule (GS) 12 Step 5, to review and approve the data, and data entry [\$982,406.72]; (4) the cost for three FNS personnel to gather, create, and approve this information collection package [\$5,321.40-GS 13 Step 1, GS 14 Step 1, and a GS 15 Step1]; and (5) automated system costs [\$180,000-includes system monitoring and salaries]. FNS salaries based on 2023 GSA tables from the Office of Personnel Management (OPM).

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 burden hours in use on OMB's inventory is 49,119 burden hours and 90,994 total annual responses. FNS is requesting a total of 49,291 annual burden hours (48,217 reporting and 1074 recordkeeping burden hours) and 91,100 total annual responses (45,603 reporting and 45,497 recordkeeping) associated with the FNS-380-1. This program change reflects an increase of 172 hours. This difference is primarily a result of now including the requirement for States to update and report the updates of the discretionary codes to FNS in this collection.

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.

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 will be published approximately one year after the end of each annual review period.

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-380-1.

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.