

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0299:

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

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A1. Circumstances that make the collection of information necessary.

Explain the 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 is a request for a revision of currently approved information collection. The U.S. Department of Agriculture is requesting a three-year renewal with this revision. In addition, on June 1, 2026, leadership at the Food and Nutrition Service officially announced an agency name change to the Food and Nutrition Administration (FNA), effective that day. Therefore, we are requesting to change the form name from FNS-380-1 to the FNA 380-1 and henceforth reference the form with the FNA acronym. State agencies are required to perform Quality Control (QC) reviews for the Supplemental Nutrition Assistance Program (SNAP). In order to determine the accuracy of SNAP benefits authorized by State agencies, a statistical sample of SNAP cases are selected for review from each State agency. Relevant information from the case record, investigative work, and documentation about individual cases are evaluated to determine the accuracy of the allotment under review. Form FNA-380-1, Quality Control (QC) Review Schedule and instructions (Appendix A), was developed by FNA for State use to collect both QC data and case characteristics for SNAP and to serve as the comprehensive data entry form for active frame SNAP QC reviews.

Section 16 of the Food and Nutrition Act of 2008, as amended (the Act), provides the legislative basis for the operation of the QC system (Appendix E). Part 275, Subpart C (Appendix F), of SNAP regulations implements the legislative mandates found in Section 16. Regulations at 7 CFR 275.1, 275.14(d) and 275.21(a) and (b)(1) provide the regulatory basis for the QC reporting requirements (Appendix F).

Section 11(a) of the Act mandates that State agencies shall keep "...such records as may be necessary to ascertain whether the program is being conducted in compliance with the provisions of this Act and the regulations issued pursuant to this Act..." The Act also specifies that these records "shall be preserved for such a period

of time, not less than three years, as may be specified in the regulations issued pursuant to this Act." SNAP regulations at 7 CFR 272.1(f) and 275.21(f), respectively, specify that program records are to be retained for a period of no less than three years from the month of origin or three years from the date of fiscal or administrative closure.

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

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

Reviewers must report review findings on the Form FNA 380-1 (Appendix A), 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 FNA 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: FNA estimates that 53 State agencies will report on 46,558 QC cases at a rate of approximately 1.056 hours per case, resulting in an estimated total of 49,165.25 annual burden hours.

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

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

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

State Agencies Recordkeeping Requirements--Part 275.4

275.4 Record Retention- FNA 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 include the FNA-380-1 as an official reporting form to FNA.

Ongoing burden hours: FNA estimates that 53 State agencies will keep records for 46,558 QC cases at a rate of approximately 0.0236 hour per case, resulting in an estimated total of 1098.77 annual burden hours.

A3. Use of information technology and burden reduction.

A3.1 - 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.

In compliance with the E-Government Act, 2002 (E-Gov), FNA has reviewed the QC review and sampling process and made every effort to streamline and automate the process. The FNA-380-1 can be automatically created through use of SNAP's automated QC system, SNAP-QCS, however for State agencies that do not use the automated system, uploads to SNAP-QCS are required for FNA submission. Screen shots from the system are in Appendix H.

A3.2 - Burden Reduction:

While not all State agencies are required to use the automated QC system, FNA-380-1 data must be electronically submitted to FNA via <http://snapqcs.FNA.usda.gov/>, a web-based database for tabulation and analysis, or a successor/subsequent FNA system developed for this purpose.

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 duplication of effort since there is no similar data available. FNA solely monitors the QC review system for payment errors in cases 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.

There are no small business involved with this data collection. FNA has determined

that the requirements for this information collection do not adversely impact small businesses or other small entities. Smaller State agencies provide the same data as larger State agencies for this collection.

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. If this collection is not conducted or is conducted less frequently, FNA would not be able to effectively monitor SNAP's QC review system or ensure program integrity. The Act mandates a QC measurement system. The Act also requires the Secretary of Agriculture to notify State agencies of their fiscal year error rates within a set time period. The only way to reduce the burden would be to reduce the number of cases subject to review or to reduce the review requirements. The number of cases sampled in this annual review depends on each State's caseload size and current sample sizes are necessary to maintain the accuracy and precision of SNAP's payment error rates to assess SNAP liabilities and, with the passage of the One Big Beautiful Bill Act (P.L. 119-21) on July 4, 2025, State cost-sharing of benefit issuances.

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). SNAP regulations at 7 CFR 272.1(f), specify that program records must 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 QC reviewed cases to be kept more than three years after the initial QC case review. There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

- 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;
- 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.

Collection of Race/Ethnicity Data

Form FNA-380-1 is used to collect characteristics data on SNAP recipients selected for QC review and each household member's race and ethnicity must be coded if the data already exists in the SNAP case record. In light of OMB's March 27, 2026 announcement of a one-year extension to submit an Action Plan for compliance with the updates to Statistical Policy Directive No. 15, Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, SNAP QC will use the 1997 standards in this collection, and will use the delayed deadline to continue to develop implementation plans for the 2024 standards.

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.

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.

Notice of this collection was published in the Federal Register on April 29, 2026 (91 FR 23055). FNA received one inquiry to review the revised form. No additional comments were received. FNA sought feedback, during virtual meetings, from the Quality Control Technical Advisory Group (QC TAG), a group made up of at least five SNAP State QC Directors including leaders, Pat M., Jeffrey H., and member Deborah D. about their views on burden updates to the FNA 380-1 collection, frequency of collection, and the clarity of instructions and recordkeeping, disclosure, or reporting format. No representatives from the QC TAG responded.

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 payment or gifts are provided 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 on the FNA 380-1, which is from the FNA QC determination of an active case review, is subject to the same privacy 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...." Section 272.1(c) of SNAP regulations implements this legislative mandate. The permanent findings of active reviews, when compiled, do not identify the recipient by name, but do contain personally identifiable information. Please see USDA/FNA-5 System of Record Notice (SORNs) "Information on Persons Disqualified from the Supplemental Nutrition Assistance Program" published in the Federal Register Volume 75, Number 237, Page 81205 on December 27, 2010 (Appendix D). In addition, our automated QC system, SNAP-QCS, has a privacy impact analysis to ensure privacy of individuals selected for QC review (Appendix C).

This information collection was reviewed and approved by FNA' acting privacy officer, Deea Coleman on April 08, 2026.

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.

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, QC indicates so on the FNA-380-1.

This information collection was reviewed and approved by FNA' acting privacy officer, Deea Coleman on April 08, 2026.

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.

Fifty-three SNAP State agencies are required to conduct QC reviews of active cases as part of the Supplemental Nutrition Assistance Program's (SNAP) Performance Reporting System. 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. Based on fiscal year (FY) 2024's active QC caseload, we estimate the fifty-three States will complete an annual active case sample of approximately 46,558 active cases nationwide and will update and report State agency discretionary codes one time each year for an estimated total of 880 responses per State agency respondent. FNA estimates States will require approximately 3 hours to annually update discretionary codes on the FNA-380-1, and approximately .25 hours to report those updates to FNA. In addition, FNA estimates each of the 46,558 case review reports will take approximately 1.06 hours to complete. In total, FNA estimates a total of 46,664 responses will be reported to FNA by 53 State agencies annually and will take approximately 49,337.50 hours a year to report.

Each of the 53 State agencies are required to maintain records of the Form FNA-380-1 for the recordkeeping requirement. FNA estimates the recordkeeping burden is .0236 hours per record for 46,558 records annually and the frequency of responses per respondent is approximately 878 responses annually. We estimate the total annual recordkeeping burden for the FNA-380-1 is 1,099 hours and the total annual records to keep annually is 46,558 records.

FNA estimates the grand total annual burden of this information collection is 50,436 hours and the total annual response is 93,222 responses. FNA arrived at this burden appendix by adding the estimated reporting burden and the estimated recordkeeping burden as follows:

Appendix B

Reporting Burden for FNA 380-1, OMB 0584-0299							
Form	Reg.	Description of Activity	No. of	Est. No. of	Est. Total	No. Hours	Est. Total

Number	Section		Respondents	Responses per Respondent	Annual Responses	per Response	Burden Hours
FNA-380-1	275.14(d)	Review Processing-Schedules-Update SA Discretionary Codes	53	1.0000	53	3	159.00
FNA-380-1	275.14(d)	Review Processing-Schedules-Report SA Discretionary code updates	53	1.0000	53	0.25	13.25
FNA-380-1	275.12(f)	Reporting of Review Findings on Form	53	878.4528	46,558	1.0560	49,165.25
Reporting Totals			53.00	880.4528	46,664.00	1.0573	49,337.50
Recordkeeping Burden for FNA 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
FNA-380-1	275.4	Record Retention	53	878.4528	46,558	0.0236	1098.7688
Recordkeeping Totals			53	878.4528	46,558	0.0236	1098.7688

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	1,758.91	93,222.00	.5410	50,436.27

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

This information collection's estimated annual reporting and recordkeeping burden is \$1,621,329.28. This includes a total State agency reporting burden of \$1,586,008.14, which includes \$1,192,487.33 base annual cost plus \$393,520.82 for fringe benefits. In addition, the total State agency recordkeeping burden is \$35,321.13 annually, which includes \$26,557.24 base annual cost plus \$8,763.89 for fringe benefits. FNA adds 33 percent to the State agency's overall respondent cost to account for the fringe benefits. The State agency cost to the public is based on \$32.23 per hour. The rate to State agencies after 25 percent reimbursement by FNA is \$24.17. To estimate

this cost, FNA used the U.S. Department of Labor's Bureau of Labor Statistics mean hourly wage for May 2025 National Occupational and Employment and Wage Estimates – 21-1020 Social Workers, (https://www.bls.gov/oes/2025/may/oes_nat.htm).

Estimates of Annualized Cost to Respondents								
Financial Burden for State Agencies FNA 380-1, OMB 0584-0299								
Type of Respondents	Reg Citation	Activity	Number of responses	Average Time Per Response	Hourly Wage Rate (75% 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	\$24.17	\$3,843.03	\$1,268.20	\$5,111.23
State Agencies	275.14(d)	Review Processing-Schedules-Report SA Discretionary code updates	53	0.25	\$24.17	\$320.25	\$105.68	\$425.94
State Agencies	275.12(f)	Reporting of Review Findings	46,558	1.0560	\$24.17	\$1,188,324.04	\$392,146.93	\$1,580,470.98
Total Reporting Burden						\$1,192,487.33	\$393,520.82	\$1,586,008.14
Recordkeeping Burden								
State Agencies	275.4	Record Retention	46,558	0.0236	\$24.17	\$26,557.24	\$8,763.89	\$35,321.13
Total Recordkeeping Burden						\$26,557.24	\$8,763.89	\$35,321.13
Grand Total Reporting and Recordkeeping Costs						\$1,219,044.57	\$402,284.71	\$1,621,329.28

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.

The annual cost to the Federal Government to collect and use the data for the FNA-380-1 is estimated to be \$1,740,637.03. This cost includes (1) 25 percent of State agencies' total costs for reporting and recordkeeping with fringe benefits; (2) the cost for 60 Federal regional staff reviewing and approving 17,491 State agency active reviews; and (3) automated system costs [includes system monitoring and salaries]. FNA hourly wages are based on the General Services Administration's 2026 tables from the Office of Personnel Management (OPM). Hourly Salary:

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/GS_h.pdf. Chart is below.

Estimates of Annualized Cost to Federal Government						
Reporting and Recordkeeping Cost for FNA 380-1, OMB 0584-0299						
Activities	Annual Responses	Hours Spent on Collection	Costs or Hourly Wage Rate	Total Cost	Fringe Benefits Cost for Staff (0.33)	Overall Cost w/ Fringe Benefits for Staff
(1) 25% Reimbursement Cost to States for reporting & recordkeeping administrative cost				\$406,516.31	\$134,150.38	\$540,666.69
(2) 60 Regional Federal Staff (GS 12 Step 5) review of 380-1 submissions	17,491	1.056	\$41.52	\$766,894.99	\$253,075.35	\$1,019,970.34
(3) 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			\$180,041.52	\$1,353,411.30	\$387,225.73	\$1,740,637.03

A15. Explanation of program changes or adjustments.

This is a request to revise a currently approved information collection. The current burden inventory is 53 States, 49,291 burden hours and 91,100 total annual responses. The revised OMB inventory for the reporting and recordkeeping burden associated with the FNA-380-1 is approximately 50,436.27 annual burden hours (49,337.50 SA reporting + 1,098.77 SA recordkeeping) and 93,222 total annual response (46,664 SA reporting + 46,558 SA recordkeeping). This program adjustment reflects an increase of approximately 1,145.46 burden hours and an increase of 2,122 total annual responses. The increases are due to more active reviews being completed for QC since the information collection was last approved.

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.

There are no plans for tabulation and publication.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in 83-I, Item 19. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I "Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.