



United States Department of Agriculture

Food and
Nutrition
Service

Park Office
Center

1320 Braddock
Place
Alexandria
VA 22314

September 17, 2020

Denise Lamere
Administrator
Bureau of Improvement & Integrity
Quality Assurance & Federal Eligibility Review Unit
129 Pleasant Street
Concord, New Hampshire 03301

Dear Ms. Lamere:

Thank you for your comments in response to the Quality Control (QC) Branch's inquiry on November 1, 2019 through the QC Technical Advisory Group, regarding the Office of Management and Budget collection 0584-0303, FNS 275 Regulations regarding sampling, arbitration, good cause claims, new investment plans and progress reports.

In your comments you mentioned you believed the current arbitration burden for States is too low at 24 hours and recommended this should be around 36 hours instead. We agree these burdens are too low and have made an adjustments to the arbitration burden hours for State agencies.

We would like to thank you for the information you provided regarding the time your State agency estimates for gathering household information, contacting households and collateral contacts, and preparing for interviews.

Sincerely,

Stephanie Proska
Chief
Quality Control Branch

Enclosures

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

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OMB Information Collection Package	State agency Reporting Requirement	Current Hrs Per Response	Too High? Too Low? or Accurate	Reason(s) why?
OMB 0584-0303	Sampling Plan	5	Accurate	If there are no major changes to annual sampling by FNS then 5 hours is reasonable.
	Arbitration	24	Low	Based upon my experience, a more reasonable time is 36 hrs per response.
	Good Cause	160		NH has not had to submit a payment error appeal and does not have any indication how long this process would take.
	New Investment Plan Template Form FNS 74 A	32		NH has not had to submit a New Investment Plan Template Form FNS 74 A and does not have any indication how long this process would take.
	New Investment Plan Template Form FNS 74 B	5		NH has not had to submit a New Investment Plan Template Form FNS 74 B and does not have any indication how long this process would take.

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

129 Pleasant St.
Concord, NH 03301
603-271-9238
Denise.Lamere@dhhs.nh.gov

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From: Moore, Pat <pat.moore@dhhs.nc.gov>
Sent: Thursday, November 14, 2019 10:20 AM
To: Christa Phillips <christa.phillips@dc.gov>; Deborah Doyle <dDoyle@dshs.wa.gov>; Lamere, Denise <Denise.Lamere@dhhs.nh.gov>; Denise Martino <dmartino@nd.gov>; Jeanne Roberts <jeanne.roberts@wyo.gov>; Joni Hicks <joni.hicks@dss.virginia.gov>; Julie Harvey <Julie.Harvey@jfs.ohio.gov>; Bruen, Kathy (<Kathy.Bruen@state.mn.us> <Kathy.Bruen@state.mn.us>; Kissia Nathaniel <Kissia.Nathaniel@dhs.arkansas.gov>; Kristin Nitcher <kristin.nitcher@otda.ny.gov>; Leslie Henderson <lhender@utah.gov>; Lisa Leibham <Lisa.LEIBHAM@dhsosha.state.or.us>; Julie Taylor <Julie.Taylor@dss.sc.gov>; Cynthia Edwards <Cynthia.edwards@mdhs.ms.gov>; Carolyn Craven (NM) <Carolyn.Craven@state.nm.us>
Cc: Fettig, Samantha <samantha.fettig@dhhs.nc.gov>
Subject: FW: [External] State Agency Reporting-Burden Estimates

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I apologize for getting this out to you so late. Please see Lacy's email below and provide comments to me and Samantha by noon tomorrow.
Again, I sincerely apologize for this last minute request.

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](#)

Office: 919-527-6282
Fax: 919-334-1266
pat.moore@dhhs.nc.gov

820 S. Boylan Avenue, Hargrove Building
2416 Mail Service Center
Raleigh, NC 27699-2416

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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)
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 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](https://www.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 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

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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](#)

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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To: [Moore, Pat; Fetting, 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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	New Investment			

	Plan Template Form FNS 74 B	5		
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Lacy O'Neal
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