



CALIFORNIA WELFARE FRAUD INVESTIGATORS ASSOCIATION

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August 25, 2020

TO: Linda Sung-Lee
Acting Chief, Retailer Administration Branch
Food and Nutrition Service – United States Department of Agriculture
1320 Braddock Place, Alexandria, VA 22314

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RE: Federal Register document number 2020-14446

TITLE: Revision of a currently approved collection in the Supplemental Nutrition Assistance Program (SNAP) Retail Store Applications

Dear Ms. Sung-Lee,

The USDA-FNS published in the Federal Register document citation number 85 FR 40186 titled Agency Information Collection Activities: Proposed Collection; Comment Request-Supplemental Nutrition Assistance Program (SNAP), Store Applications, Forms FNS-252, FNS-252-C, FNS-252-E, FNS-252-FE, FNS-252-R and FNS-252-2. Comments were solicited on this proposed retail store application revision.

This commentary is from the California Welfare Fraud Investigators Association (CWFA), a non-profit, professional organization of individuals who are employed as Welfare Fraud Investigators, or in other positions whose primary duty is dealing with fraud in public assistance programs. Our organization's goal is to assure that welfare fraud is detected, prevented, and/or prosecuted in order to maintain program integrity in public assistance programs. CWFA has had an active role in developing, supporting, and promoting policy towards those goals. CWFA's input is solicited from State and Federal agencies in the performance of their duties. We consider ourselves a major stakeholder in SNAP policy creation.

CWFA fully supports this proposed revision of the retail store application. The additional requirement of listing multiple varieties of the basic food staples will help thwart the unscrupulous retailer who has the intent to defraud the SNAP program. The higher the stocking unit inventory required, the less likely a thief trying to make a quick dollar will want to tie up his assets to achieve the trafficking profits.

CWFA fully supports any policy change that will increase program integrity, and this revised application will achieve that goal. Fraud units throughout the Nation recognize that one retailer trafficking SNAP benefits affect several hundreds of individuals and reduces the benefits meant for the eligible needy. Retail trafficking needs to be stopped and hopefully this revised application will help keep the crooks from the SNAP program.

CWFIA is committed to maintaining program integrity in the SNAP program and keeping the covenants of the Farm Bill intact. If there is anything our organization can do to assist the USDA-FNS with our unique expertise in fraud, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Mahony', with a large, stylized flourish at the end.

Gregory Mahony
CWFIA – Treasurer
&
National Outreach Chairman