



**COMMENT REGARDING FOOD
PROGRAM REPORTING SYSTEM
FORMS FNS 583 AND FNS 366B (OMB
CONTROL NUMBER: 0584-0594)**

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Agriculture**

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The Food and Nutrition Service has not published the annual error rate for spending in the food stamp program since 2019.ⁱ This has created a situation in which members of the public asked to fund the program and policymakers charged to oversee it cannot fulfill their obligations as informed citizens or watchful stewards.

Instead, they are left to guess about the state of the program's integrity by collecting anecdotes, gleaning incomplete information, and reading between the lines of proposed regulatory and procedural changes such as the agency's proposed merger of Forms FNS 583 and FNS 366B. The latter is the subject of this brief comment.

What do we know?

We know that food stamps, long hailed as the least wasteful welfare program, had a payment error rate on a steady rise even before the COVID-19 pandemic. The rate increased from 3.66 percent in 2014 to 7.36 percent in 2019.ⁱⁱ

We also know that once the COVID-19 pandemic arrived, some public assistance programs, such as Medicaid, continued to release program integrity metrics. These metrics have painted a shocking picture. The improper payment rate in Medicaid in 2021 was more than 21 percent, meaning that the federal government spent nearly \$100 billion improperly in a single year in a single program—more than the entire budget of almost every state in the unionⁱⁱⁱ

The lack of similar transparency in food stamps leaves us guessing about how program integrity in food stamps compares to its own recent history or Medicaid today.

As such, we look at the agency's request for comments regarding a proposed merger of Forms FNS 583 and FNS 366B with what we believe is a healthy skepticism. Because it remains unclear what the precise changes proposed are, our skepticism colors this comment.

As an institution, many of us at Opportunity Solutions Project have experience working in state agencies and all of us regularly rely on state agencies and their employees. We certainly support and appreciate the agency's stated goal of consolidating or reducing unnecessary administrative burdens.

However, we can say with confidence that the information reported on these forms, such as the number of investigations, disqualification hearings, and prosecutions, is necessary to maintaining accountability. In fact, we encourage the agency to use these forms for that purpose more effectively by publishing submissions so that members of the public and policymakers have access to the same information and can form more educated opinions about policy changes.

Additionally, the agency should consider tracking more types of information through forms like these, from cyberattacks to non-criminal but erroneous payments to state and county-based ratios of the number of fraud investigators compared to the number of households.

The issue of how to update these forms may not be central in many Americans' lives. But inflation, an enduring worker shortage, and distorted supply chains—all directly or indirectly related to the radical expansions of public assistance spending in the last two years—*are* the primary challenges in Americans' lives today. Getting a stronger grip on wasteful spending in a program as big as food stamps is a critical part of addressing the problem.

In short, whatever changes or updates to these forms the agency is working toward, we strongly encourage the department to strengthen their central purpose—regular reports on fraud and waste—and not to weaken it. This is a time for more program integrity efforts, not fewer.

Respectfully submitted,

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ⁱ Food and Nutrition Service, "SNAP quality control error rates," U.S. Department of Agriculture (2022), <https://www.fns.usda.gov/snap/QC/error-rates>

ⁱⁱ Ibid.

ⁱⁱⁱ Centers for Medicare & Medicaid Services, "PERM error rate findings and report," U.S. Department of Health and Human Services (2022), <https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicaid-and-CHIP-Compliance/PERM/PERMErrorRateFindingsandReport>