

Appendix Y. Comment from CWFIA

OMB No. 0584-[NEW]

Assessing SNAP Participants' Fitness for Work

Project Officer: Eric Sean Williams

Office of Policy Support
SNAP Research and Analysis Division
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CALIFORNIA WELFARE FRAUD INVESTIGATORS ASSOCIATION

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September 17, 2021

TO: Eric Williams

Food and Nutrition Service – United States Department of Agriculture
1320 Braddock Place, Alexandria, VA 22314

Executive Board Officers

President
Guy Christian
Tulare County
(559) 901-8554

RE: Federal Register document number 2021-15916

TITLE: Agency Information Collection Activities: Assessing Supplemental Nutrition Assistance Program (SNAP) Participants' Fitness for Work.

Vice President
John Martire
Mendocino County
(707) 621-4557

Secretary
Randy Fedak
Santa Cruz County
(831) 706-1044

Dear Mr. Williams,

Treasurer
National Committee Chair
Gregory Mahony
San Bernardino County
(909) 971-7054

The USDA-FNS published in the Federal Register document number 2021-15916 titled Agency Information Collection Activities: Assessing Supplemental Nutrition Assistance Program (SNAP) Participants' Fitness for Work. Comments were solicited on this proposed collection of data and evidence. CWFIA expects to be part of this process as a Stakeholder and submits this commentary.

Business Manager
Jean Yurkovic
El Dorado County
Cell: (530) 957-4153

This commentary is from the California Welfare Fraud Investigators Association (CWFIA), 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. CWFIA has had an active role in developing, supporting, and promoting policy towards those goals. CWFIA'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.

CWFIA supports the proposed collection of information and believes it will profit FNS in discovering how states determine Supplemental Nutrition Assistance Program (SNAP) participants' fitness for work. The information gathered certainly would help FNS assess states' needs for assistance in making the fitness for work determinations or even in developing their plan to do so. However, CWFIA believes that the number of states chosen for the case studies is far too few. FNS should consider case studies in more states to obtain better data.

Also, CWFIA questions how the states will be chosen for the case studies. The document does not make any mention of the criteria that will be used to choose the states for the studies. Will the criteria be based on the number of people in the state versus the number Supplemental Nutrition

Assistance Program (SNAP) participants in that state? Would FNS ask for volunteers for the case studies? The criteria used to determine the participants in the case studies needs to be considered.

Within this proposal, FNS has also requested ways to minimize the burden of the collection of information. CWFIA believes that after a few interviews, a digitized document could be emailed to fraud investigators within the State of concern which would have basic questions to past problems found. With the ability to respond electronically, FNS should be able to farm a multitude of responses within a short time period.

At this time, the general public does not know which States have been selected for this collection of data. If California is selected, CWFIA would highly expect to be part of the process as a Stakeholder. With over 400 members in multiple States and Territories and our strong partnership with our State agencies, we are always an available asset to FNS to provide strong data and solutions to SNAP. CWFIA is committed to maintaining program integrity in the SNAP program and keeping the covenants of the Farm Bill intact.

Sincerely,



Gregory Mahony
CWFIA – Treasurer
&
National Outreach Chairman



Megan Escudero
Welfare Fraud Specialist II
San Joaquin County
Human Services Agency