Michelle Lujan Grisham, Governor
Kari Armijo, Secretary
Alex Castillo Smith, Deputy Secretary
Kathy Slater Huff, Deputy Secretary
Kyra Ochoa, Deputy Secretary
Dana Flannery, Medicaid Director
Niki Kozlowski, ISD Director

Title: Supplemental Nutrition Assistance Program: Reporting of Lottery and Gambling, and Resource Verification.
OMB Control Number: 0584-0621.
Expiration Date: December 31, 2025.
Type of Request: Revision of a currently approved collection.

To whom it may concern,

On behalf of the State of New Mexico, Health Care Authority (HCA) appreciates the opportunity to comment on the proposed information collection under the Supplemental Nutrition Assistance Program (SNAP), specifically related to the reporting of lottery and gambling winnings. We offer the following feedback in response to the requested areas (a) through (d), based on our understanding of how this proposal would function in real-world administration.

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

HCA recognizes the intent behind collecting gambling and lottery winnings information is to ensure the accuracy of SNAP eligibility determination for households. From a policy standpoint, there is practical utility in knowing when a household receives a substantial lump sum that could impact their program eligibility. However, for the State of New Mexico, the current proposal raises serious concerns about operational feasibility. Without federal coordination or a centralized mechanism, the time and effort required to create and manage these partnerships will be significant. While the data may be useful, the decentralized collection method proposed will strain already limited administrative resources and could ultimately outweigh the benefit.

(b) The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used

The burden estimates provided appear to understate the actual workload that state agencies will bear. In our experience, the proposal fails to fully account for the staff hours, legal review, systems development, and inter-agency coordination that will be required. For example, creating new contacts with each racing casino and/or gambling entity, renegotiating data sharing agreements, and initiating change requests (CRs) for system updates will involve multiple levels of staff across our legal, IT, and program administration teams. These tasks are neither quick nor uniform across sites. In particular, system enhancements to support new data tracking and reporting requirements will come at a significant cost, both in terms of funding and time, as states must modify or expand existing infrastructure. The assumptions used in the burden calculation seem to emphasize the time required for household reporting but do not adequately capture the operational demands placed on states to support, track, and manage these data processes. We encourage the USDA to revisit the burden estimate and expand it to reflect the full scope of implementation responsibilities at the state level.

(c) Ways to enhance the quality, utility, and clarity of the information to be collected

The clarity and usefulness of the information collected would benefit greatly from standardization and federal guidance. Currently, it is unclear what constitutes "substantial" winnings, how that should be defined or verified, or whether states will be expected to interpret that independently. For the State of New Mexico, consistency in definitions is critical to ensure equitable treatment of SNAP households and uniform implementation across local field offices. We recommend USDA issue clear definitions, standard data elements, and detailed guidance for states and data providers alike. Additionally, information received from gambling entities should be required to follow a standardized electronic format to ensure data quality and reduce manual reconciliation efforts.

(d) Ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology

The most effective way to minimize burden on both agencies and SNAP households would be through federal coordination and the use of centralized, automated data systems. We strongly recommend that USDA explore establishing a federal or state-level partnership with gaming commissions or lottery authorities, rather than placing the onus on individual states to develop separate agreements with each private gaming entity. For New Mexico, a centralized hub or clearinghouse model that aggregates data and shares it securely with state SNAP systems would significantly reduce staff time, increase consistency, and improve security. This approach is especially important for working with Tribal gaming operations, where frequent leadership changes often disrupt or delay the negotiation and renewal of data sharing agreements. Additionally, USDA could provide standard templates for data sharing agreements and technical support for API integration into state eligibility systems. Automating the ingestion and processing of gambling data would improve accuracy and reduce human error, while easing the burden on frontline workers.

In closing, while we support efforts to uphold the integrity of the SNAP program, the proposed decentralized and site-by-site implementation structure for collecting gambling winnings data presents serious practical and operational challenges for the State of New Mexico. We urge USDA to consider alternatives that reduce burden, streamline coordination, and support states with the tools and infrastructure needed to implement this policy effectively.

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