

Attachment #12

From: [McDonough, Jana](#)
To: [SNAP State Administration Branch - FNS](#)
Subject: FNS-366B comments
Date: Thursday, September 03, 2015 1:45:57 PM

Thank you for the opportunity to provide comments in regards to the proposed FNS-366B changes.

I question the need for the additional information. Example..Does the audience for this form really need to know the average number of days for an investigation? Given the type of case, etc, and the amount of work needed, this information would seem to be useless knowledge. Would every state interpret the information the same? If an investigator would take some time off, would that be counted 'against' them as the final number of days would obviously be longer than if they hadn't taken time off?

The ability to calculate investigation costs is another example of how each state could misinterpret the information needed. Unless there is a standard calculation form, I think the meaning of the term is subject to interpretation.

It would be very difficult and time consuming to calculate the percentage of the cost of an investigation when there may be one investigation involving more than one program.

Nebraska is lucky that at the current time, we have a data collection system capable of capturing most of the information. However, additional information needed will be a time consuming task which again begs the question of the need for the specific information.

If approved, I think we will find the process more burdensome than it is now. I think the form should be modified to make it a simpler form in the hopes of maintaining integrity across state lines (similar interpretations).

Thank you for your time.

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