

Dear Ms. Kramer:

Thank you for submitting comments to Federal Register listing FNS-2015-0018-0001, Agency Information Collection Activities; Proposals, Submissions, and Approvals: Food Program and Reporting System on behalf of the North Dakota Department of Human Services. This is a response from the Food and Nutrition Service (FNS) to your comments regarding burden hours and cost. All other relevant comments are addressed in the Supporting Statement for this Information Collection Request. The Supporting Statement will be publicly available upon approval by the Office of Management and Budget.

Comment: "The data referred to in the notice is already being collected and reported to FNS. In addition, FNS is aware of which states are high performing and those states that require significant improvement. Rather than place an additional burden on those states who are accurately reporting, FNS should provide training and technical assistance to address the issues/concerns in those states identified as inaccurately reporting data. This responsibility should not be shifted to States.

The request for timeliness data proposed on the 366B would:

- be administratively burdensome;
- require extensive programming changes and costs to our 31year old mainframe system;
- require IT staff resources which are in very short supply;
- require substantial tracking and reporting for our local county social service offices to ensure we receive the information needed to complete the 3668;
- implementation of policy related to prosecutions and tracking program dollars and days ; and,
- require completion of a training package for county social service staff to ensure they are reporting correctly."

[...]

"As federal Program Access Reviews (PAR's) are now being completed on an annual basis which include timeliness of application processing and Recipient Integrity Reviews are also being conducted by FNS at the state level, the findings of these reviews should be used to assist those states performing poorly. _High performing states should 'not be burdened with making significant reporting changes that will cost time and money when the outcome or results will be the same. How will the information/data you are seeking assist those states who are performing poorly?"

FNS Response: FNS collects information on program access through Quality Control (QC) reviews and Management Evaluations (ME); however, this information differs from the information proposed to be collected on the 366B in significant ways. The initial application timeliness data collected through the Quality Control (QC) process was primarily designed to identify top performing States, and as a result, is not well-suited to monitoring program access in other States. The proposed changes to the certification data elements on the 366b include all overdue applications for the entire caseload from the designated reporting period. This data will differ from that reported by QC, as QC data only represents a sample of cases and does not include information related to the length of time a case has been pending. Data from ME reviews examines general compliance with program access requirements, but does not collect quantitative data on initial and recertification applications. The purpose of collecting overdue counts of applications and recertifications is to help FNS both identify States that may be in need of technical assistance, and identify States that have an efficient process where best practices can be gleaned.

While FNS realizes that some programming changes will be necessary to implement the revised reporting requirements, these costs are more than outweighed by the need for effective program administration, including regular monitoring of certification caseload. In addition, States should already have processes in place to monitor initial and recertification application processing throughout the State and be supporting those processes through staff training, as needed.

Recipient Integrity Reviews are not a substitute for this information collection. FNS conducts reviews to ensure that SNAP integrity policies are properly implemented and to provide an additional opportunity for FNS to review data reported in this information collection. FNS requires this data from all States for all reporting periods. Reviews are too infrequent meet this need.

Thank you again for your submission,