



August 17th, 2016

Dear Jane Duffield,

IE: Proposed collection of SNAP Trafficking Controls and Fraud Investigations

The State of Colorado is a County Administered state. Colorado does not currently withhold the 5th EBT card from a client that has had 4 or more card replacements within 12 months. The Colorado EBT Department held a workgroup and invited all 64 counties to attend to discuss this option. The feedback that we received from the stakeholders was overwhelming; it is evident that withholding the card is not a viable solution for Colorado at this time. The negatives pointed out during the workgroup consist of:

- Not enough staff at the county to meet with the client one on one
- Concern that a client is unable to get to an office
- Withholding the replacement card is more expensive due to the extra letter
- Investigators believe that a face to face meeting with a client is a waste of time since the client does not have to respond to the questions
- Outdated client contact information creates additional workload for the counties

Therefore, the proposed collection is not necessary for the proper performance of the functions of our agency. In fact, collection of this data is impossible.

Sincerely,

Veronica Brandl
State of Colorado EBT Program
(303)866-2740

