

**Florida Department of Children & Families
Office of Public Benefits Integrity**

**Comments on Program and Budget Summary Statement
Part B – Program Activity Statement (FNS-366B)**

1. Is the proposed collection of information necessary for the agency to perform its functions? Does the information have practical utility?

Florida's public benefits integrity staff work on SNAP, TANF, and Medicaid cases (often a combination of the three programs). We cost all of the public benefits integrity functions through a specific cost pool already contained within the Department's cost allocation plan, which is based on percent of applications the department receives for the various programs.

- a. If the apportionment methodology used for cost allocation is used to allocate the investigation costs and investigation FTE, will it also be acceptable for reporting the requested information on the FNS-366B? If so, this element can be provided with minimal additional effort. However, *if using the current methodology this is not acceptable*, it will be time consuming to develop and maintain needed data collection processes to be able to report cost and staffing relating to investigative functions for SNAP eligibility fraud vs. SNAP trafficking cases, with little practical utility to the department. Furthermore, it would be very cumbersome to account for vacancies and turnover during the reporting period using the FTE calculation method indicated in the instructions.
- b. Is the calculation of the difference between the investigation start date and disposition date sufficient for reporting section E.(f) Average # Days per Investigation? If so, this element can be provided with minimal additional effort. However, if this is not the case and this element intends to require a detailed time and activity accounting by case worked, it would require significant re-engineering of current case management systems. In addition, investigative FTE often work on multiple investigations during any particular day, so imposing such an additional administrative burden would reduce the productivity of our already insufficient investigative resources.
- c. What is meant by "all costs" in section E.(g) Investigation Costs? Is this item intended to include investigators' salary *and benefits*, overhead costs for program administration, and other department-wide allocated support costs, e.g., costs for legal advice on SNAP cases? If so, this needs to be clearly articulated to be able to get a complete picture of the cost to investigate cases involving SNAP fraud. Without providing such detailed instruction, the FNS-366B will continue to result in inconsistent data reporting across state programs. (See recommendation 3.a. below.)

2. Is the agency's estimate of the burden hours accurate? Are the methodology and assumptions used to calculate the burden hours valid?

Florida has not estimated the burden hours for expansion of the FNS-366B reporting requirements; however, at a minimum, moving to quarterly reporting will increase current costs by a factor of four.

3. Are there ways of enhancing the quality, utility, and clarity of the information to be collected?

- a. Unless extensive additional instructions are provided, requiring the detailed reporting of Investigation Costs and Investigation FTE will likely cause extensive additional effort to collect and result in continued inconsistencies in data reported by states. Instead, **we recommend collecting Dollars Saved per Investigative FTE**, where “Dollars Saved” is the amount of SNAP benefits that otherwise would have been fraudulently obtained. This number would be easier for states to calculate while still providing a reasonable measure of the return on the investment for SNAP fraud prevention and detection.
- b. If information on Investigation Costs and Investigation FTE is going to be collected, we recommend providing states with detailed instructions re: the types of costs and staff to include in this number to help promote consistency in reporting.
 - i. Suggest adding instructions for section B to clarify the required reporting period.
 - ii. Suggest clarifying the following in E. Fraud Investigations:
 - (e) Open Investigations – Should this number include cases that have been referred for prosecution or are pending court action?
 - (f) Average # Days per Investigation – Should an investigation be considered “complete” when it is referred for prosecution or ADH?
 - iii. Is the total number of cases investigated (on previous 366B) purposely excluded from this form? If so, why? We **recommend adding Investigation Not Pursued** – This would provide the complete picture, including cases that could not be investigated due to size, workload, or other reasons.

4. Are there ways to minimize the burden of collecting and reporting this information? Are there automated, electronic, mechanical, or other technologies that can help?

Automated systems certainly could reduce the burden of collecting and reporting this information; however, our state has neither the personnel nor the funding to be able to make the system changes that would be required to produce the specific information requested in this form.