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September 1, 2015

Jane Duffield, Chief, State Administration Branch
Program and Accountability and Administration Division
Supplemental Nutrition Assistance Program
United States Department of Agriculture
Food and Nutrition Services
3101 Park Center Drive, Room 818
Alexandria, VA 22302

Dear Ms. Duffield:

The purpose of this correspondence is to provide comment as it relates to the proposed information collection activities for the Food Program and Reporting System and the FNS-366B; Federal Register, Volume 80, No. 128. These comments follow the format of the FNS-366B Instructions.

D. Fair Hearings

D.1.f

Define “withdrawn requests”. Does this statistic include both agency and client withdrawals? Under D.1., where, are Hearing removals or Hearing denials reported? Where is no jurisdiction issues reported? If the agency has no option to report these statistics, the final count will not reconcile.

E. Fraud Investigations

E.1.c and E.2.c

Missouri’s fraud case tracking system (Welfare Investigations Unit [WIU] Database) would require an enhancement to capture and track this data. This enhancement can be easily achieved and without cost to the agency.

E.1.d and E.2.d

The WIU Database does not capture data to compute cost savings due to a decrease in benefits as the result of a disqualification. The majority of the data needed to perform this

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computation is housed in two separate systems. These two systems do not interface with each other nor do they interface with the WIU Database. All three systems would have to be significantly enhanced to interface, extract, and track cost savings. The cost to the agency would be exponential. Further, the agency's current eligibility determination system is undergoing a complete restructuring whereby information will be moved from the existing system into a web-based system. Any new enhancements to the current eligibility system are not likely to be approved at this time. The projected completion date of the new eligibility determination system is unknown. Until such time the systems are enhanced, data would be collected and calculated through manual processes. Reported statistics would be a best guestimate result.

E.1.g and E.2.g

- 1) Define "All costs". Specifics are needed as it relates to types of cost; i.e. salaries, vehicle expense, subpoena expense, hotel expense, etc.
- 2) A majority of food stamp cases involve other public assistance programs; Temporary Assistance for Needy Families, Medicaid, Child Care, etc. How will the agency extract the cost of the food stamp investigation when other programs are involved?

E.1.h and E.2.h

Missouri welfare fraud investigators are not specialized; meaning, the majority of welfare fraud cases require investigating multiple public assistance programs at one time. There is not individual investigator(s) assigned to work only food stamp fraud cases. What method could be used to determine the number of FTE's dedicated to food stamp fraud? If no method is provided, reported statistics would be a best guestimate result.

F. Administrative Disqualification Hearings

F.1.f and F.2.f

The WIU Database does not capture data to compute cost savings due to a decrease in benefits as the result of a disqualification. The majority of the data needed to perform this computation is housed in two separate systems. These two systems do not interface with each other nor do they interface with the WIU Database. All three systems would have to be significantly enhanced to interface, extract, and track cost savings. The cost to the agency would be exponential. Further, the agency's current eligibility determination system is undergoing a complete restructuring whereby information will be moved from the existing system into a web-based system. Any new enhancements to the current eligibility system are not likely to be approved at this time. The projected completion date of the new eligibility determination system is unknown. Until such time the systems are enhanced, data would be collected and calculated through manual processes. Reported statistics would be a best guestimate result.

F.1.g (h) (i) (j) and F.2.g (h) (i) (j)

Define "referred". Does this refer to ADH referrals from the Welfare Investigations Unit to the Family Support Division or from the Family Support Division to the Division of Legal Services Hearings Unit? Or does this mean ADH referrals from any source to the Hearings Unit? In the event an ADH referral is refused because of an invalid address, where would

this information be reported and is it needed? If the agency has no option to report these statistics, the final count will not reconcile.

G. Prosecutions

G.1.b and G.2.b

G.1.d and G.2.d

The WIU Database would require enhancements to capture and track this data.

G.1.f (g) and G.2.f (g)

The WIU Database does not capture data to compute cost savings due to a decrease in benefits as the result of a disqualification. The majority of the data needed to perform this computation is housed in two separate systems. These two systems do not interface with each other nor do they interface with the WIU Database. All three systems would have to be significantly enhanced to interface, extract, and track cost savings. The cost to the agency would be exponential. Further, the agency's current eligibility determination system is undergoing a complete restructuring whereby information will be moved from the existing system into a web-based system. Any new enhancements to the current eligibility system are not likely to be approved at this time. The projected completion date of the new eligibility determination system is unknown. Until such time the systems are enhanced, data would be collected and calculated through manual processes. Reported statistics would be a best guestimate result.

G.1.h and G.2.h

Define "no action by Prosecutor". For example, a case may remain with the Prosecutor because he/she simply does not have time to review the case. No action is being taken but it still is (to us) being considered. In Missouri, at the time a prosecutor does not file charges, the case is considered declined (not accepted) and an ADH is then pursued. If the prosecutor files charges and later dismisses the case due to insufficient evidence, an ADH is not pursued.

I can be contacted at 573-751-0903 if clarification is needed. Thank you.



Bridget Hug
Chief of Investigations
Division of Legal Services

cc: Gina Boxberger
Michele Struempf
File